

EPA
HAZARDOUS
RCRA PL
WASTE
BRANCH
StarEnterprise

1992 MAY 7 AM 10:03

L T Townsend
Manager
Port Arthur Area



P O Box 712
Port Arthur TX 77641 0712
409 989 7001

April 28, 1992

heng

Re: Star Enterprise - Port Arthur Plant
TWC Permit No. HW-50188
EPA I.D. No. TXD008097529
Consolidation Areas - Groundwater
and Financial Assurance Certification
ENV 1602

Mr. Jesus Garza
Executive Director
Texas Water Commission
P. O. Box 13087, Capitol Station
Austin, TX 78711-3087

Attention: Mr. Minor B. Hibbs, Chief
Permits Section
Hazardous and Solid Waste Division

Dear Mr. Garza:

Enclosed are certifications concerning installation of a groundwater monitoring system at the Star Enterprise facility referenced above. This monitoring system was installed in accordance with the existing RCRA Part B Permit conditions at consolidation areas containing wastes considered the newly listed primary and secondary sludges (F037 and F038) generated during the separation of oil/water/solids from petroleum refining process wastewaters.

These sludges became subject to regulation under Subtitle C of RCRA as listed wastes on May 2, 1991. The consolidation areas which were utilized for the active management of sludges following this effective date have been included in this certification, and in previous Class 3 permit modifications for the facility.

Closure plans for these units were submitted to the TWC in my letter dated October 24, 1991. These closure plans provide closure cost estimates which have been incorporated in the financial assurance established for the facility.

This correspondence certifies that the consolidation areas are in compliance with all applicable 40 CFR Part 265 groundwater monitoring and financial responsibility requirements prior to the date 12 months after the effective date of the rule listing these wastes as hazardous, in compliance in 31 Texas Administrative Code (TAC) 305.69(g)(1)(E).

Mr. Jesus Garza

Page 2

April 28, 1992

Amendments to existing RCRA Part B permit conditions will be submitted following completion of geotechnical testing from the monitor well installation program.

If any additional information is required, please contact Mr. Ron Korbini at (409) 989-7171.

Yours very truly,

STAR ENTERPRISE

Signed: L. T. TOWNSEND/PME

RLK:JMD

cc: Mr. B. J. Wynne, III, EPA, Dallas, TX
Mr. Keith Anderson, TWC, District VI, Beaumont, TX

Enclosures

STATEMENT OF CERTIFICATION

Construction of monitor wells RCW-19 through RCW-23, at the Reservoir No. 14 Consolidation Areas located at the Star Enterprise facility in Port Arthur, Texas is in compliance with provision VI.U. of the Texas Water Commission (TWC) RCRA Part B Permit HW-50188. These monitor wells have been installed in accordance with the design specifications identified in Section VI of the Part B Permit Application ("Attachment E") dated November 7, 1985, as revised June 22, 1987. State of Texas Well Reports have been submitted to the TWC via certified mail, as required by law.

The consolidation areas contain sludges which became subject to regulation under Subtitle C of RCRA as a listed waste on May 2, 1991. The groundwater monitoring system has been installed within one year of the effective date of this regulation, and in compliance with all applicable 40 CFR Part 265 ground-water monitoring requirements.



David R. Smith, Senior Scientist
K.W. Brown Environmental Services

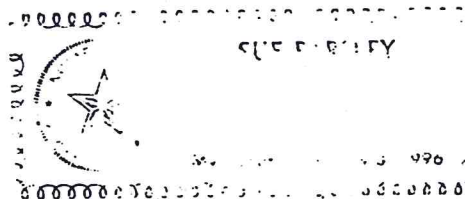
I, L.T. Townsend (Name), Manager, Port Arthur Area (Title)
I, [Signature] (Name), [Signature] (Title)

Certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of civil penalty and criminal fine.

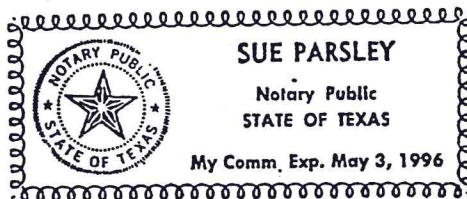
Signature: _____ Date: _____

Signature: _____ Date: _____

SUBSCRIBED AND SWORN to before me by the said L.T. Townsend on this 27th day of April, 1992 My commission expires on the 3 day of May, 1996.



Sue d. Parsley
Notary Public in and for
Jefferson County, Texas



StarEnterprise

Kenneth R Hall
Plant Manager



P O Box 712
Port Arthur TX 77641-0712
409 989 7001
FAX 409 989 7774

October 3, 1994

TO THE ADDRESSEE:

RE: Notice of Permit Modification
Class 1 Permit Modification;
Star Enterprise Port Arthur, Texas Plant;
Hazardous Waste Permit No. HW-50188

This letter serves as a Notice of Permit Modification. This notice is provided in accordance with requirements set forth in 30 TAC Section 305.69(b)(1)(B). A Class 1 Permit Modification has been submitted to the Texas Natural Resource Conservation Commission (TNRCC). This modification incorporates administrative changes to the Part A and Part B to reflect the listing of primary sludge (EPA Waste Code F037). This waste is already authorized in the Star Enterprise permit, and the modification is required to update the waste definition in Star's permit. The permit modification request has been prepared in accordance with the requirements of 40 CFR 270.42.

Sincerely,

STAR ENTERPRISE

:bph



August 30, 1994

Mr. Paul S. Lewis, Manager
Corrective Action Section
Industrial and Hazardous Waste Division
TNRCC
P.O. Box 13087
Austin, Texas 78711-3087

ENSR Consulting
and Engineering
3000 Richmond Avenue
Houston, Texas 77098
(713) 520-9900
(713) 520-6802 (FAX)

Re: Star Enterprise - Port Arthur Refinery
Solid Waste Registration 30121 Hazardous Waste Permit No. HW-50188
Closure of the Archon Reservoirs
Scope of Work to Provide Additional Information

Dear Mr. Lewis,

Star Enterprise has reviewed the TNRCC letter dated August 19, 1994 which requested that additional information be developed to support the evaluation of long-term risks to human health and the environment for the proposed final Archon Reservoir closure. The proposed closure approach was based on data from one representative unit (Reservoir No. 6) of 10 units covering approximately 115 acres.

ENSR has prepared a scope of work to provide the requested information. A description of these activities follows:

1) Baseline Risk Assessment

- 1.0 Constituents of Concern
 - 1.1 Identification of constituents of concern and their respective concentration ranges present in the stabilized Archon materials.
- 2.0 Reservoir Perimeter Risk Evaluation
 - 2.1 Identification of constituents within the reservoirs which exceed acceptable Industrial risk standards. (risk drivers)
 - 2.2 Identification of constituents within the reservoirs which would exceed acceptable residential risk standards.
 - 2.3 Cumulative risks posed by the constituents of concern.
- 3.0 Pathway/Receptor Evaluation
 - 3.1 Identification of potential exposure pathways if the perimeter risk evaluation identifies unacceptable risks.
 - 3.2 Groundwater conditions - specifically TDS conditions
- 4.0 Other Factors
 - 4.1 Potential for current and future releases.
 - 4.2 Degree of uncertainty in the evaluation.
 - 4.3 Industrial land use demonstration.



Mr. Paul S. Lewis
August 30, 1994
Page 2

2) **Archon Permeability**

Previous submittals included three permeability data points from Area No. 6. One core sample will be collected from six of the remaining nine areas for laboratory falling head permeability testing (ASTM D-5084). The remaining areas are not presently accessible for coring.

3) **TPH Leachability Testing**

One core sample will be collected from each of the ten areas. The ten samples will be subjected to EPA SW-846 Method 1312 leachate extraction followed by Method 418.1 TPH analysis.

Please contact Mr. Jim Raithel at 409-989-7111 or me at 713-520-9900 if you have any questions concerning this information.

Sincerely,

A handwritten signature in black ink that reads 'Wm Thomas Beck'.

Wm. Thomas Beck
Sr. Program Manager

cc: Mr. Jim Raithel - Star Enterprise
Mr. Jay Carsten - TNRCC, Austin
Mr. Ray Marlow - TNRCC, Region 10 - Beaumont
Mr. John Rinehart - EPA, Region VI - Dallas

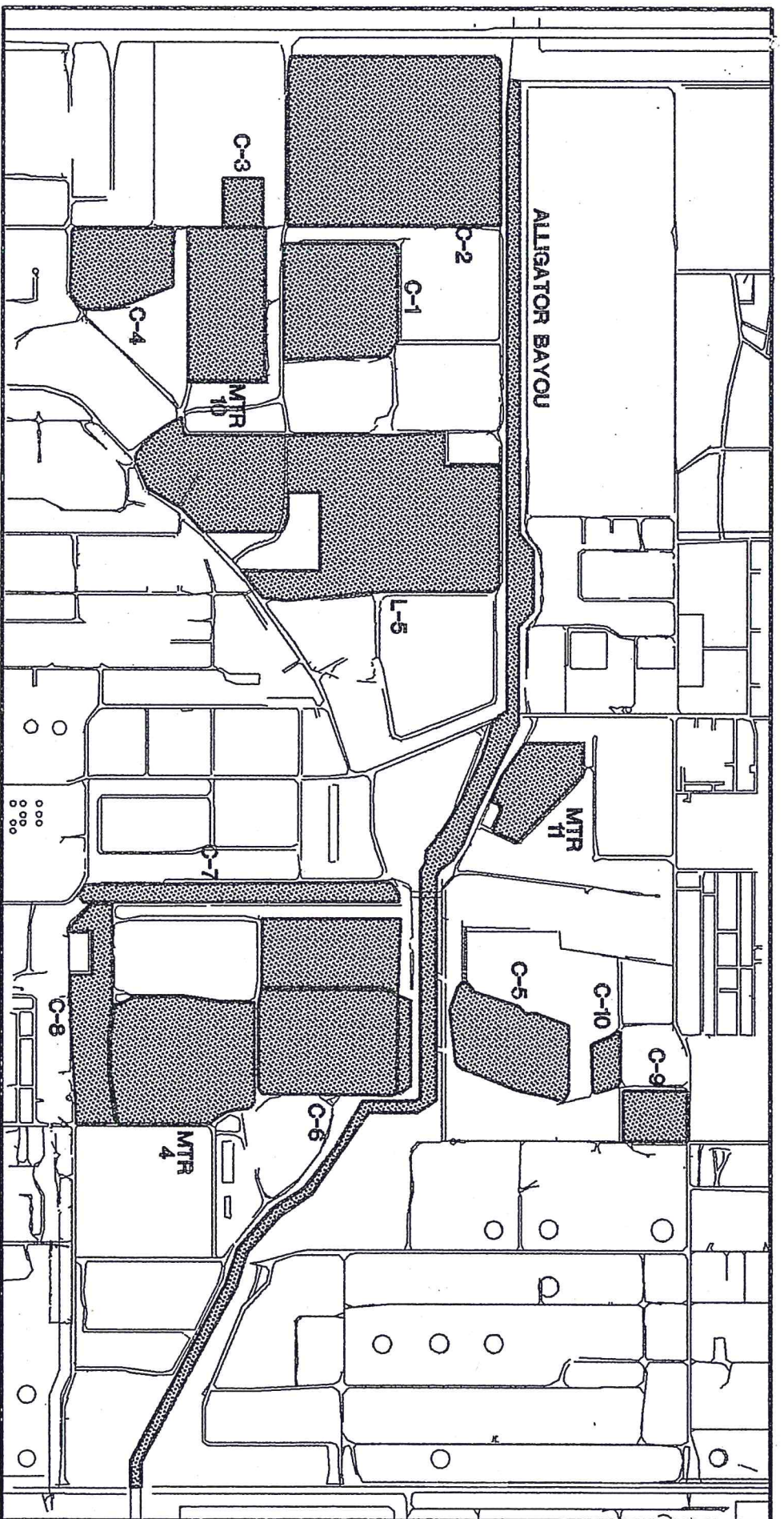
AGENDA
Meeting with TNRCC & EPA
September 20, 1994

*S Jan
End-approval*

Objective:

Discussion of how CAMU approach could be used at the three MTR cells, with emphasis on disposal of material being generated by wastewater segregation project.

- * Why Star is interested in CAMUs at MTR Cells
 - * Units becoming available as segregation project completes
 - * Material being generated by ditch cleaning
 - * Future needs
 - * Material considered for placement in CAMU
 - * Ditch cleaning material
 - * Material already in cells
 - * Material from SWMUs within facility as they are addressed
 - * Material from remediation activities associated with AO, especially Alligator Bayou
 - * Remediation waste from miscellaneous sites throughout refinery
 - * Length of time required to secure necessary review & approval
 - * Will approval be joint or separate
 - * Will either TNRCC or EPA take "lead"
 - * Anticipated timing following submittal
 - * Why timing is of concern
 - * Amount of material being generated by ditch cleaning
 - * The squeeze between early start date and completion date
 - * Is "temporary authorization" available option
 - * Physical description of MTR cells
 - * Location within plant & previous service
 - * Linings & leachate collection system
 - * Non-CAMU approaches to handling ditch cleaning material
 - * 30 day extension applied for
 - * Any other type of extensions available (consecutive 30 day extns, etc.)
 - * Consider material in ditch as part of unit contiguous with MTR Cells
 - * Placement in LTU if material meets BDAT
- 1) Action steps to proceed



LEGEND



Affected Areas



STAR ENTERPRISES
PORT ARTHUR PLANT

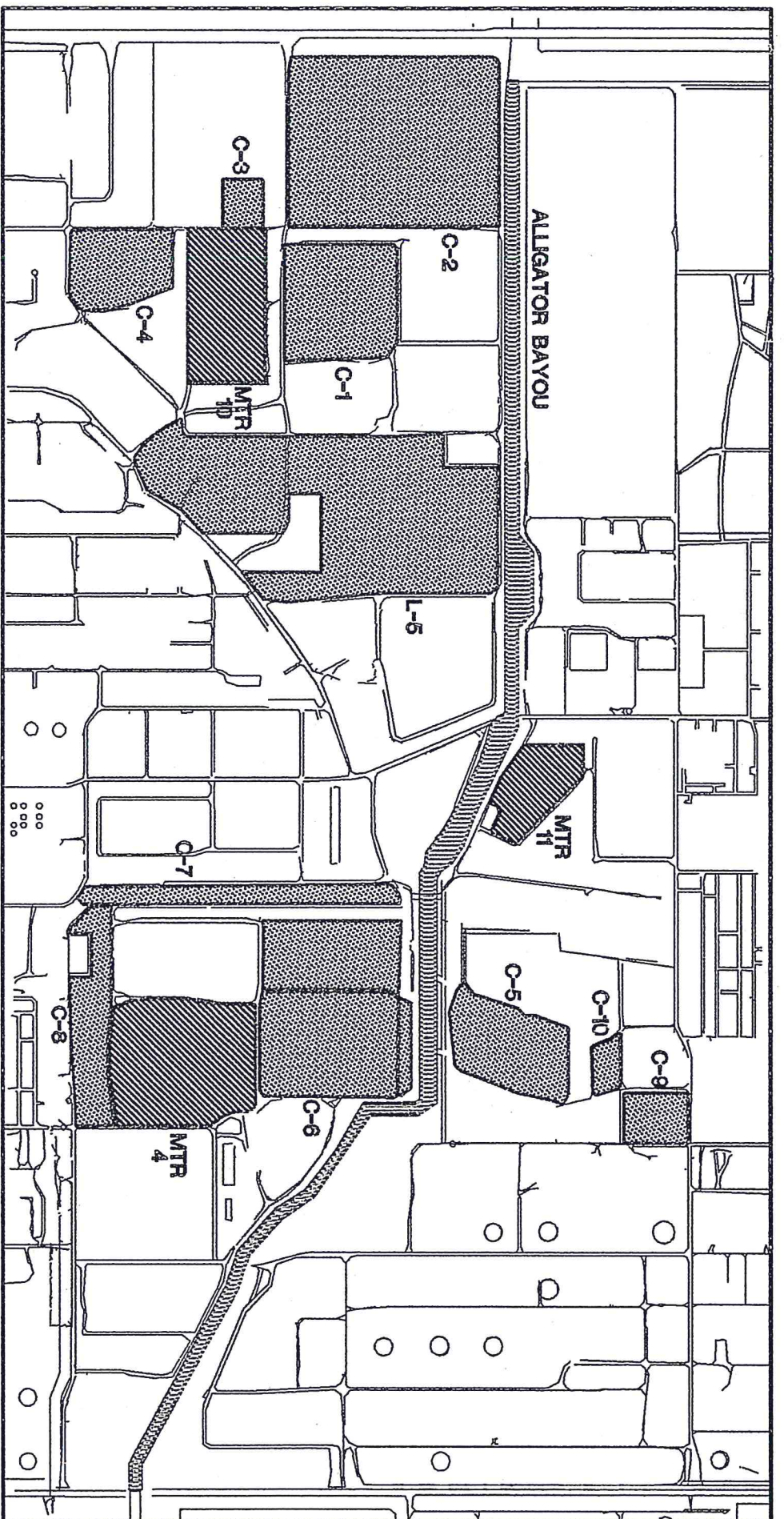
3-1544-600

CURRENT CONDITIONS




Port Arthur, Texas

CURRENT DATE: 8-20-94 CAD FILE: (DWG) STAR-PA-1544P01

Reltec
REMEDIATION
TECHNOLOGIES INC.



LEGEND

-  Affected Areas
-  CAMUs
-  Areas of Completed Corrective Action

APPROXIMATE
SCALE
0 100' 200' 400' 600'

STAR ENTERPRISES
PORT ARTHUR PLANT

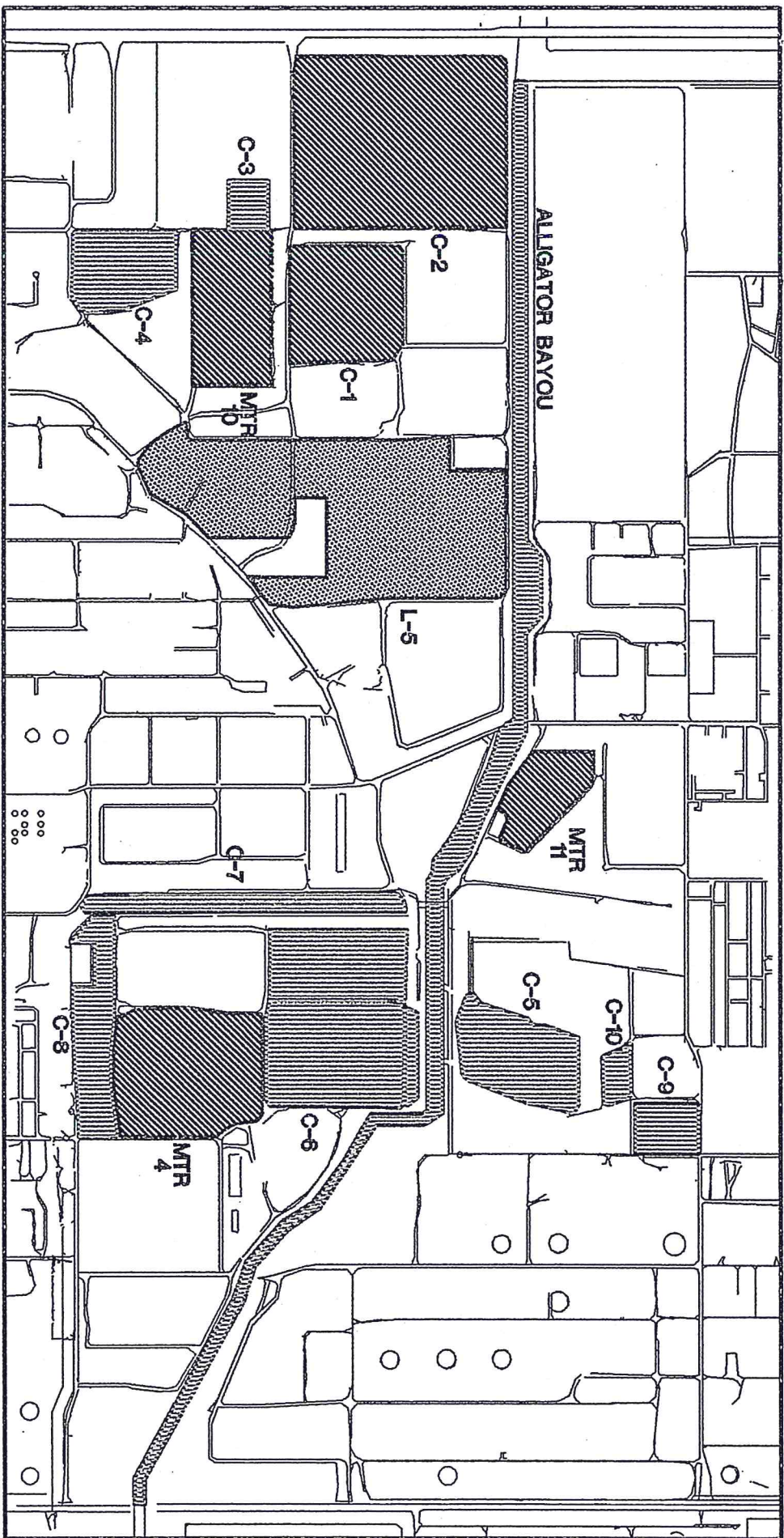
3-15144-800

CAMU, PHASE I

Port Arthur, Texas

CURRENT DATE: 8-20-94 CSD FILE: DMSS\STAR-PA\15144P02

Relbco
REMEDIATION
TECHNOLOGIES, INC.



LEGEND

-  Affected Areas
-  CAMUs
-  Areas of Completed Corrective Action

APPROXIMATE
SCALE
0 100' 200' 400' 800'

STAR ENTERPRISES PORT ARTHUR PLANT

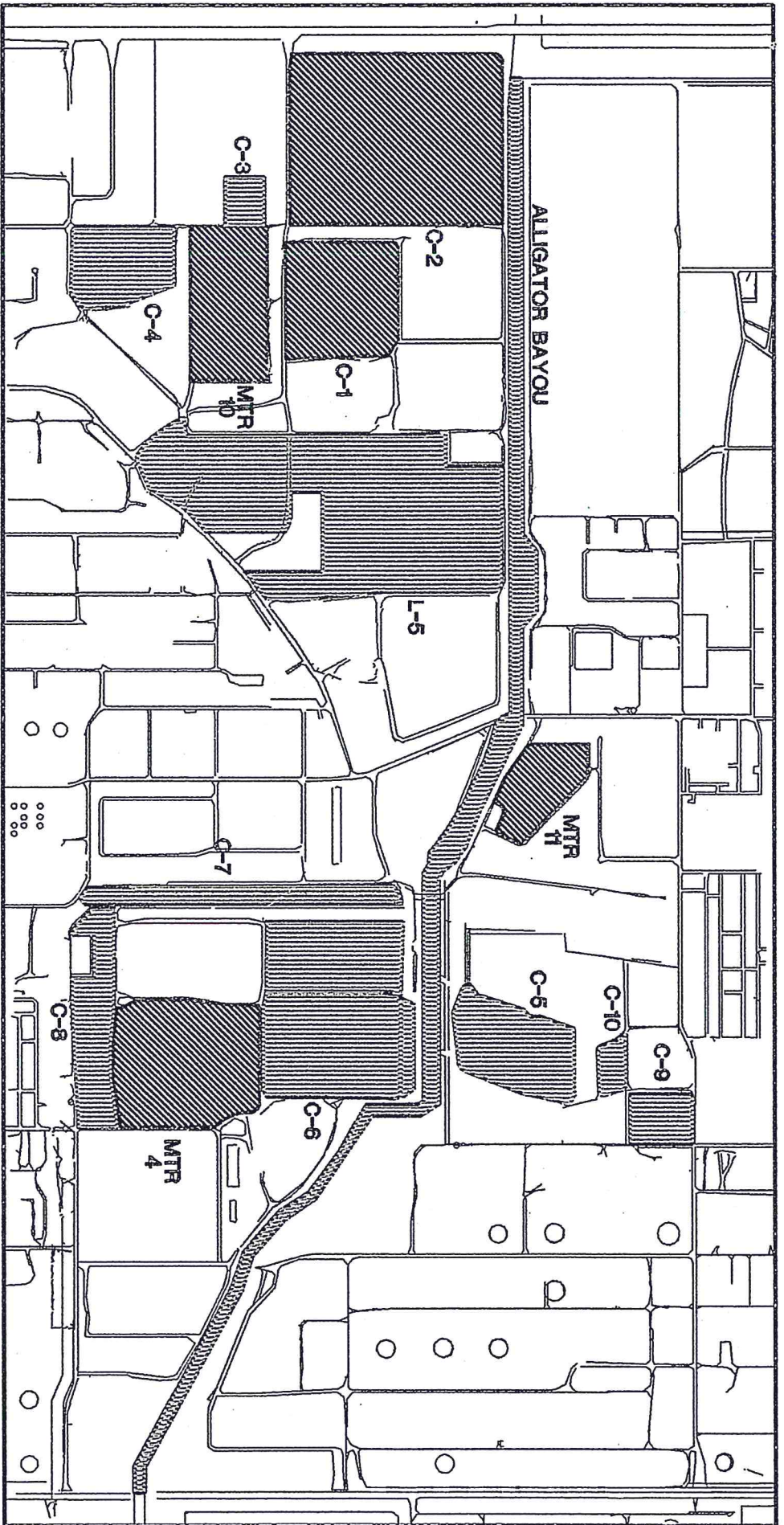
3-1644-600

CAMU, PHASE II

Port Arthur, Texas

CONSENT DATE: 11-20-94 CAD FILE: DWG\STAR-PA\1644600

**REMEDIATION
TECHNOLOGIES, INC.**



LEGEND

-  Closed CAMUs
-  Areas of Completed Corrective Action



STAR ENTERPRISES
PORT ARTHUR PLANT

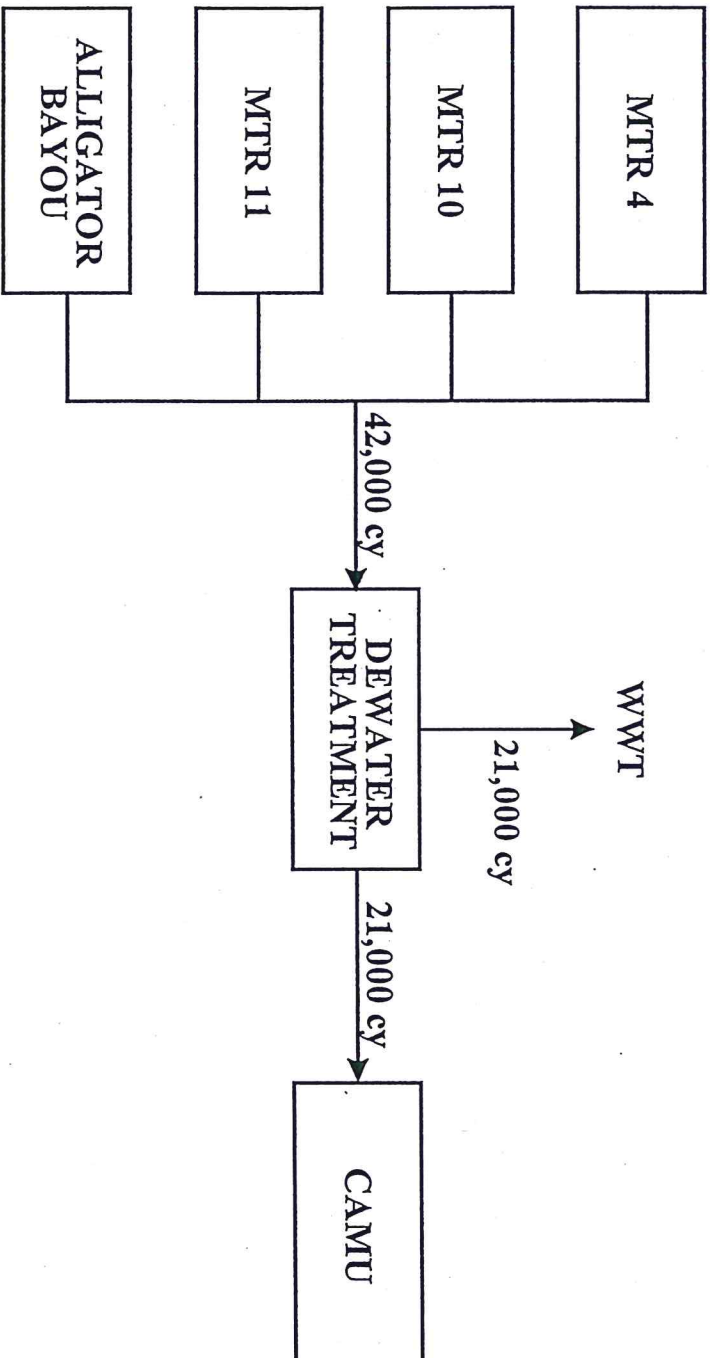
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CAMU, PHASE III

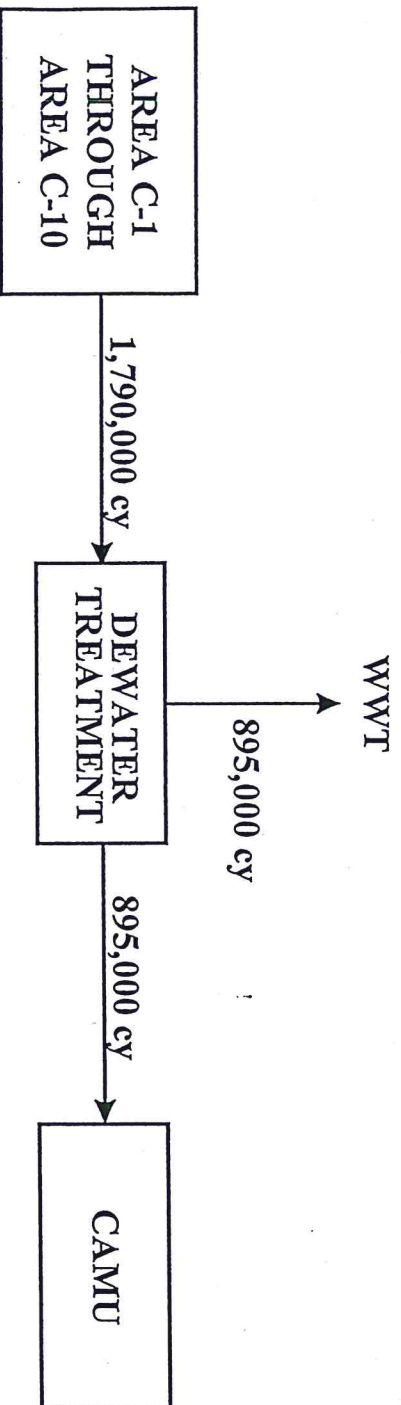
Port Arthur, Texas

CURRENT DATE: 9-20-94 CUB FILE: DMCA STAR-PA 1644804

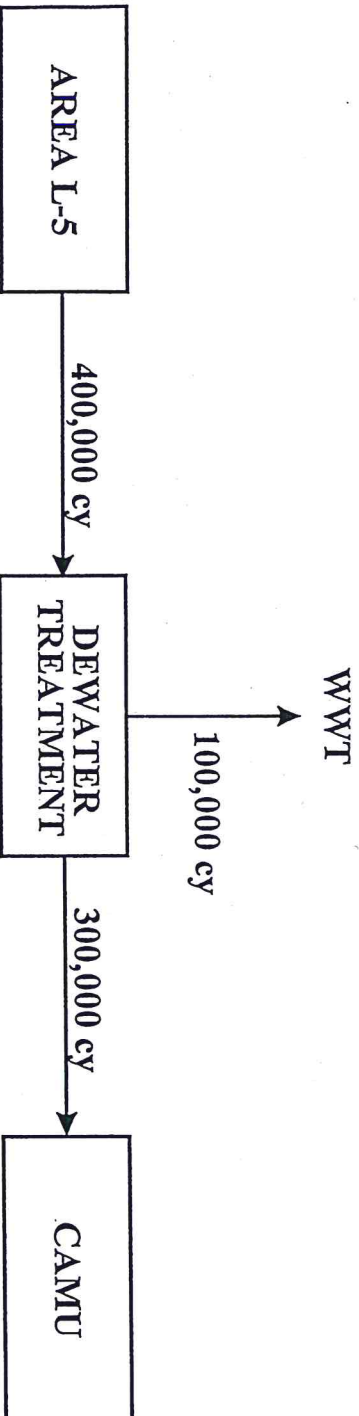
Reltec
REMEDIATION
TECHNOLOGIES INC.



**STAR ENTERPRISE
CAMU, PHASE I**



**STAR ENTERPRISE
CAMU, PHASE II**



**STAR ENTERPRISE
CAMU, PHASE III**

STAR ENTERPRISE

CAMU SUMMARY

DESCRIPTION	AFFECTED MATERIAL VOLUME	CONCENTRATIONS	CONTAMINANT MASS	CONTAMINANT MASS REDUCTION	AERIAL EXTENT
Initial Conditions	2,230,000 cy	10% O&G 100,000 ppm	158,000 tons		91 ac
Completed Corrective Action	1,025,000 cy	3% O&G 30,000 ppm	47,400 tons	70%	36.2 ac

SCHEDULE:

Phase I	6 Months
Phase II	8 Years
Phase III	4 Years
Total	12 - 15 Years

John Hall, *Chairman*
Pam Reed, *Commissioner*
Peggy Garner, *Commissioner*
Anthony Grigsby, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

August 19, 1994

Mr. K.R. Hall
Manager, Port Arthur Area
Star Enterprise
P.O. Box 712
Port Arthur, Texas 77640-0712

Re: Closure Approach Reservoir No. 6 Port Arthur Refinery
Request for More Information
Solid Waste Registration No. 30121
Hazardous Waste Permit No. HW-50188
EPA Id. No. TXD008097529

Dear Mr. Hall

The Texas Natural Resource Conservation Commission (TNRCC) has reviewed the document titled Closure Approach Reservoir No. 6 that was submitted in November 1993. The report contains a conceptual approach for design of a landfill cover for Reservoir No. 6 that will be the model for an additional 115 acres of surface impoundments containing non-hazardous stabilized waste. The material includes sludge placed before the F-037 listing date that is considered non-hazardous provided the material is not actively managed. As a supplement to the November 1993 proposal, Star prepared a document dated May 24, 1994 that included a summary of analytical results from historical sampling activities and from recent TCLP analyses. All sample results were collected from Reservoir No. 6. The goal of the supplementary submittal was to compare analytical results from the stabilized material with the risk based cleanup levels described in Risk Reduction Standard #2. The letter concluded, that when subjected to EPA method 1312 extraction for volatiles and semi-volatiles the results fall below the MSC for ground water.

Following a meeting with the Commission on June 23, 1994, Star's consultant prepared a letter dated July 18, 1994 to summarize the major issues discussed in the meeting. The letter pointed out the apparent conflict between remediation criteria of the Risk Reduction Rules and the TNRCC Technical Guideline No. 3. This letter was prepared to request additional information about the stabilized waste so long term risks to human health and the environment can be assessed.

Mr. K.R. Hall
Star Enterprise
Page 2

For a Standard No. 2 closure, the Risk Reduction Rules require that contaminants either be removed or decontaminated to applicable levels [TAC 335.553 (a)]. For Risk Reduction Standard No. 2 the rules also state that in order for decontamination to be achieved a treatment process must be utilized that permanently alters all contaminants [TAC 335.553(b)]. Permanence is further defined in TAC 335.552, definitions, as a property of the contaminated media that will "endure indefinitely". Based on the Commission's understanding of the ARCHON stabilization process, the treatment is a control measure rather than a permanent treatment process that will endure indefinitely; therefore, the Commission requires that the closure activities of the ARCHON stabilized surface impoundments be addressed under Risk Reduction Standard No. 3.

A Standard No. 3 closure requires that a Baseline Risk Assessment (BRA) be performed. Unlike most BRA, baseline conditions for the 150 acre areas include material that has already been treated. Therefore, the representative contaminant concentrations used in the BRA should be determined from the stabilized material. Preparation of a BRA will also allow for determination of a cumulative risk for each contaminant migration pathway and chemical of concern.

The Commission suggests that prior to completion of the BRA that a workplan be prepared that presents key aspects of the assessment. This should include, at a minimum, the following items:

- 1) the representative or range of contaminant concentrations of affected media that will be used in the BRA;
- 2) the proposed exposure pathways;
- 3) the proposed locations of receptors;
- 4) the Total Dissolved Solids of ground water underlying the stabilized areas;
- 5) alternatives for assessing current and future cross-media affects of soil contamination to ground water.

In addition to preparation of a Baseline Risk Assessment for a Standard No. 3 closure, the TNRCC requires that a scope of work be developed to determine a representative permeability or range of permeabilities for the stabilized material. The TNRCC feels that three results presented in the submittal received to date are insufficient to characterize a 150 acre area. The scope of work should include provisions for collecting subsurface samples from borings within the stabilized areas at several locations and assessing the permeability.

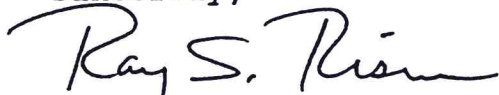
Mr. K.R. Hall
Star Enterprise
Page 3

The TNRCC requires that STAR develop a scope of work to assess the likelihood of petroleum hydrocarbons trapped in the stabilized matrix to leach from the material to ground water. The scope of work should include collecting representative samples of the stabilized material.

Please prepare an original and three (3) copies of all correspondence, even if the correspondence is sent on letterhead from Star's consultant. The original and one (1) copy should be sent to the TNRCC, addressed to the Executive Director of the TNRCC, to the attention of Mr. Paul S. Lewis, Manager Corrective Action Section, Industrial and Hazardous Waste Division, Box 13087, Austin, Texas 78711-3087. The other two copies should be forwarded to the TNRCC Regional Office and the EPA, respectively.

If you have any questions concerning the contents of this letter please contact Mr. Jay Carsten of the Corrective Action Team at (512) 239-2348.

Sincerely,



Ray S. Risner, Manager
Corrective Action Team
Industrial & Hazardous Waste Division

jc

Enclosure

cc: John Rinehart, EPA Region VI - Dallas
Ray Marlow, Region 10 - Beaumont
John Williamson, I&HW Div., Permits Section
Teres Jimenez, I&HW Div., Permits, Groundwater Section
Tennie Larson, I&HW Div., Corrective Action Section (CA-305)

JR

StarEnterprise

Kenneth R Hall
Plant Manager



P O Box 712
Port Arthur TX 77641-0712
409 989 7001
FAX 409 989 7774

August 2, 1994

TO THE ADDRESSEE:

Re: Notice of Permit Modification Application
Class 3 Permit Modification Application;
Star Enterprise Port Arthur, Texas Plant;
Hazardous Waste Permit No. HW-50188

Attached please find a Notice of Permit Modification Application. This notice is provided in accordance with requirements set forth in 40 CFR 270.42(b)(2), and TAC Section 305.69(d)(4). A Class 3 Permit Modification application has been submitted to the Texas Natural Resource Conservation Commission (TNRCC). These modifications include both hazardous waste management operations changes, as well as administrative changes to the Part A and Part B that are not currently covered under Hazardous Waste Permit No. HW-50018. The permit modification request has been prepared in accordance with the requirements of 40 CFR 270.42.

Yours very truly,

STAR ENTERPRISE

MDMY:JMD

Attachment

PUBLIC NOTICE

**NOTICE OF CLASS 3 PERMIT MODIFICATION APPLICATION;
STAR ENTERPRISE PORT ARTHUR, TEXAS PLANT
HAZARDOUS WASTE PERMIT NO. HW-50188**

Star Enterprise Port Arthur Plant (Star), located at the north end of Houston Avenue in Port Arthur, Texas has requested a Class 3 Permit Modification to Texas Natural Resource Conservation Commission (TNRCC) hazardous waste permit No. HW-50018. The modifications request revisions to waste analysis procedures and monitoring procedures, storage capacity, notification and personnel training procedures, as well as administrative changes to the Part A and Part B that are not currently covered under Hazardous Waste Permit No. HW-50018.

In accordance with 30 TAC Section 305.69(d)(4), Star will hold a public meeting on this application on August 30, 1994, at 5:00 p.m. at the following location: Employee's Building, Star Enterprise Port Arthur Plant, Port Arthur, Texas.

Requests for a public hearing on this application should be submitted in writing to

Claire Arenson, Assistant Chief Hearings Examiner
Texas Natural Resource Conservation Commission
P. O. Box 13087 Capitol Station
Austin, Texas 78711
(512) 463 - 7875

within 60 days from the date of publication of this notice. The Texas Natural Resource Conservation Commission will also hold a public meeting on this application if requested by an affected person within 30 days of the date of publication of this notice.

Written comments and/or requests for further information on the application should be addressed to the TNRCC contact person, Mr. Johnny Williamson, Permit Coordinator, Industrial and Hazardous Waste Permits Section, at the same address, telephone number (512) 239 - 6631, within sixty (60) days of the date of publication of this notice. The permittee's compliance history during the life of the permit being modified is available from the TNRCC contact person.

The contact person for Star on this application is:

Star Contact Person
Mr. Bill Wimberly
Supervisor, Environmental Health and Safety
Star Enterprise, Inc. P. O. Box 712
Port Arthur, Texas 77641
(409) 989 - 7050

A copy of the modification request can be viewed and copied at the following location:

Port Arthur Public Library Reference Department
3601 Cultural Center Drive
Port Arthur, Texas 77642

StarEnterprise

K R Hall
Plant Manager



EP-2400-111
HAZARDOUS WASTE
RCRA PERMITS CRAND.

1993 OCT -8 PM 1:32

P.O. Box 712
Port Arthur TX 77641 0712
409 989 7001
FAX 409 989 7774

October 4, 1993

P 991 398 095

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Ms. Laurie King
Section Chief
Oklahoma-Texas Permits Section
Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202-2733

Dear Ms. King:

Attached is a June 29, 1993 letter addressing Provision No. 6(h) of an Agreed Enforcement Order with the TWC issued January 28, 1991. This provision discusses potential RFI issues at our North API Separator. We have responded to the TNRCC concerning the issues raised in the June 29 letter. However, since Provision 6(h) concerns HSWA and, since we are not sure of the TNRCC jurisdiction over HSWA, we are forwarding to you a copy of the "Proposed Phase II North API Separator Investigation" for your information and further handling that you believe is appropriate.

Your cooperation in this matter is greatly appreciated. Should you have any questions, please contact Mr. R. L. Korbini of my staff at (409)989-7171.

Yours very truly,

STAR ENTERPRISE

SIGNED: K. R. HALL/WFW

RLK:JMD

Attachments

cc: John Rinehart, USEPA Region VI, Dallas, TX
Deanna Epperson, TNRCC, Austin, TX
Paul Lewis, TNRCC, Austin, TX

John Hall, Chairman
B. J. Wynne, III, Commissioner
Pam Reed, Commissioner



EPA REGION VI
HAZARDOUS WASTE
RCRA PERMITS BRANCH

1991 NOV 26 PM 2:53

TEXAS WATER COMMISSION

PROTECTING TEXANS' HEALTH AND SAFETY BY PREVENTING AND REDUCING POLLUTION

November 21, 1991

David Neleigh, Chief
Texas Section
Hazardous Waste Management Division
U. S. Environmental Protection Agency
Region VI - 6H-PT
1445 Ross Avenue
Dallas, Texas 75202

Re: Star Enterprise - Port Arthur
Solid Waste Registration Number 30121
Permit Application Number 50188
EPA I. D. Number TXD008097529

Dear Mr. Neleigh:

Enclosed is a request for a Class III modification received on October 29, 1991 to the hazardous waste permit for the subject facility.

Comments should be addressed to Leon Byrd at (512) 463-7935.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cheryl A. Wilson".

Cheryl A. Wilson
Reports and Information Management
Industrial and Hazardous Waste Division

BB:bb/am

Enclosure

cc: Lawrence E. Pewitt, P.E., Permits, Texas Air Control Board,
12124 Park 35 Circle, Austin, Texas 78753
Keith Anderson, Manager, Texas Water Commission, District 6
Office - Beaumont

John Hall, Chairman
B. J. Wynne, III, Commissioner
Pam Reed, Commissioner



EPA REGION VI
HAZARDOUS WASTE
RCRA PERMITS BRANCH

1991 NOV 33 AM 8:33

TEXAS WATER COMMISSION

PROTECTING TEXANS' HEALTH AND SAFETY BY PREVENTING AND REDUCING POLLUTION

November 22, 1991

David Neleigh, Chief
Texas Section
Hazardous Waste Management Division
U. S. Environmental Protection Agency
Region VI - 6H-PT
1445 Ross Avenue
Dallas, Texas 75202

Re: Star Enterprise
Solid Waste Registration Number 30121
Permit Application Number 50188
EPA I. D. Number TXD008097529

Dear Mr. Neleigh:

Enclosed is a request for a Class I modification received on May 1, 1991 for the subject facility.

Comments should be addressed to Leon Byrd at (512) 463-7935.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cheryl A. Wilson".

Cheryl A. Wilson
Reports and Information Management
Industrial and Hazardous Waste Division

BB:bb/am

Enclosure

cc: Keith Anderson, Manager, Texas Water Commission, District 6
Office - Beaumont

JSW# 30121

StarEnterprise

L T Townsend
Manager
Port Arthur Area



P O Box 712
Port Arthur TX 77641 0712
409 989 7001

May 2, 1991

HAND DELIVERED

Re: Class 1 Permit Modifications
Star Enterprise - Port Arthur Plant
EPA I.D. No. TXD008097529
TWC Permit No. HW-50188-000
ENV 1381, 1310

Mr. Allen Beinke
Executive Director
Texas Water Commission
P. O. Box 13087
Capitol Station
Austin, TX 78711-3087



Attention: Mr. Minor Hibbs, Chief
Permits Section
Hazardous and Solid Waste Division

Dear Mr. Beinke:

Star Enterprise is hereby transmitting the Class 1 permit modification request referenced above. This includes revisions to the RCRA Part A permit for our refinery located in Port Arthur, Texas. Enclosed are four copies and a formal transmittal letter. The signature of your staff below acknowledges receipt of this package.

Yours very truly,

STAR ENTERPRISE

L. T. Townsend

ORM:JMBs

Received

Name Leon Byrd
Texas Water Commission
Signature Leon Byrd
Date 5-2-91

ISW# 30121

StarEnterprise

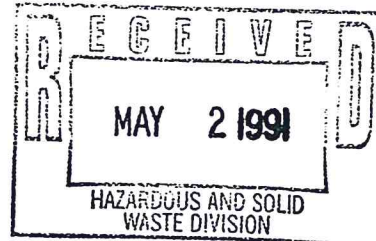
L T Townsend
Manager
Port Arthur Area



P O Box 712
Port Arthur TX 77641 0712
409 989 7001

May 1, 1991

Re: Class 1 Permit Modifications
Star Enterprise - Port Arthur Plant
EPA I.D. No. TXD008097529
TWC Permit No. HW-50188-000
ENV 1381, 1310



Mr. Allen Beinke
Executive Director
Texas Water Commission
P. O. Box 13087
Capitol Station
Austin, TX 78711-3087

Attention: Mr. Minor Hibbs, Chief
Permits Section
Hazardous and Solid Waste Division

Dear Mr. Beinke:

Please find enclosed four copies of the Class 1 permit modification request referenced above. These modifications have been submitted in accordance with 40 CFR Section 270.42, to enable temporary authorization for operation of two(2) active consolidation/storage facilities, a protective filing for eight(8) consolidation/storage facilities, and the operation of a lined wastewater conveyance system. In addition, this amends our previous submissions of September 24, 1990 (Class 1 Permit Modifications - Toxicity Characteristics Leaching Procedure) and March 21, 1991 (Class 3 Permit Modification) to indicate that the Minimum Technology Requirement (MTR) surface impoundments will be used for settling solids which may be considered primary or secondary (F037 and F038) sludges.

The active consolidation/storage facilities have been constructed within the confines of the existing wastewater impoundment at the facility. Materials meeting the description of the listed primary or secondary wastes (F037 or F038), generated prior to May 2, 1991, from several locations will continue to be placed into this facility after May 2, 1991.

Mr. Allen Beinke
Page 2
May 1, 1991

The other eight(8) consolidation/storage facilities received materials meeting the description of the listed primary or secondary wastes (F037 or F038) generated before May 2, 1991. We are submitting a protective filing in case the facilities become active in the future. No waste will be placed in these facilities after May 2, 1991.

The facility wastewater conveyance system is lined and incorporates an underdrain collection system. This system will be used to manage facility wastewater streams which may generate sludges which would be considered primary and secondary (F037 and F038) sludges.

Star Enterprise will prepare the required Class 3 Part B Permit Modifications within 180 days of the effective date of this new regulation.

If additional information is required, contact O. R. Marshall at (409) 989-7166.

Yours very truly,

STAR ENTERPRISE

L. T. Townsend

ORM:JMBs

cc: Mr. Robert E. Layton, Jr., EPA, Dallas, TX
Mr. Keith Anderson, TWC, District VI, Beaumont, Tx

Enclosures

cc: Sherry Pierce, ITEX, Dallas, Tx
Leon Byrd, TWC, Austin, Tx

StarEnterprise

L T Townsend
Manager
Port Arthur Area



P O Box 712
Port Arthur TX 77641 0712
409 989 7001

October 24, 1991

Re: Class 3 Permit Modifications
Star Enterprise - Port Arthur Plant
EPA I.D. No. TXD008097529
TWC Permit No. HW-50188-000
ENV 1381, 1310

Mr. Allen Beinke
Executive Director
Texas Water Commission
P. O. Box 13087, Capitol Station
Austin, TX 78711-3087

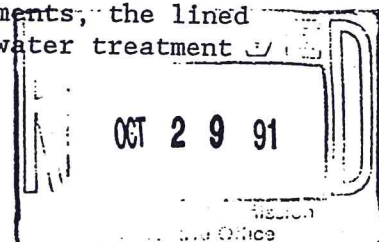
Attention: Mr. Minor Hibbs, Chief
Permits Section
Hazardous and Solid Waste Division

Dear Mr. Beinke:

Please reference my May 1, 1991 letter to you. As indicated in that letter, we are submitting a Class 3 permit modification for the subject facility. Enclosed are five (5) copies of a Class 3 Permit Modification. In addition, six amended copies of the Part B Section I (General Information) are included. This permit modification includes a modified Part A Permit Application which reflects the necessary changes for this facility.

This permit modification is necessary for the following reasons:

- o The continued management of sludges which meet the description of the newly listed hazardous wastes, Petroleum Refinery Primary Oil/water/solids Separation Sludge, (F037), and Petroleum Refinery Secondary Oil/water/solids Separation Sludge, (F038). The primary or secondary (F037 or F038) sludges will potentially be generated in three Minimum Technology Requirement (MTR) surface impoundments, the lined wastewater conveyance system, or other wastewater treatment facilities.



Mr. Allen Beinke
October 24, 1991
Page 2

- o Closure of two consolidation cells. As indicated in my May 1, 1991 Class 1 permit modification, two areas in the former Reservoir No. 14 were used to consolidate primary sludges (F037) before and after the effective date (May 2, 1991) of this listing. We will discontinue the operation of the Southwest and West Consolidation areas in the former Reservoir No. 14; therefore, we are not requesting a permit to operate these facilities. In this submittal, there is a plan for the closure and post closure activities.
- o Approval to add absorbent material to waste (meeting the definition of treatment) in containers operating under the less than 90 day accumulation exemption without a permit.

Enclosed is a check for \$150.00 for the permitting fee. Should questions arise, please contact O. R. Marshall at (409) 989-7166.

Yours very truly,

STAR ENTERPRISE

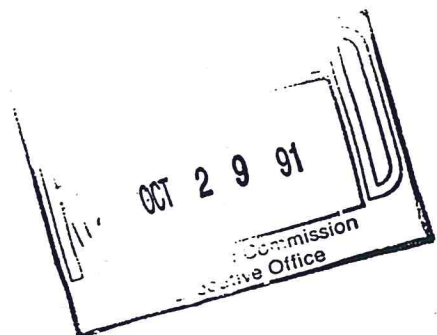
L. T. Townsend RJS

ORM:JMD

cc: Mr. Robert E. Layton, Jr., EPA, Dallas, TX
Mr. Keith Anderson, TWC, District VI, Beaumont, TX

Enclosures

cc: Steve Markusen, ITEX, Dallas, TX
Sherry Pierce, ITEX, Dallas, TX
Leon Byrd, TWC, Austin, TX



StarEnterprise

L T Townsend
Manager
Port Arthur Area



P O Box 712
Port Arthur TX 77641 0712
409 989 7001

October 24, 1991

CONFIDENTIAL

Re: Class 3 Permit Modification
High Rate Sludge Reactor (HRSR)
Port Arthur Plant (PAP)
TWC Solid Waste Registration No. 30121
Permit No. HW-50188-00
ENV 1310

Mr. Allen Beinke
Executive Director
Texas Water Commission
P. O. Box 13087, Capitol Station
Austin, TX 78711-3087

Attention: Mr. Minor Hibbs, Section Chief
Hazardous and Solid Waste Permits Section

Dear Mr. Beinke:

This letter is being submitted for the following reasons:

1. In accordance with 31 T.A.C. 335.6(a), to notify of our intent to operate an experimental unit to treat nonhazardous waste and RCRA listed hazardous waste.
2. To request a Class 3 Permit Modification for the subject permit for the operation of the HRSR to treat RCRA Hazardous Waste.
3. To request (for the hazardous waste treatment only) under Subchapter K - Research, Development and Demonstration Permits, 31 T.A.C. 305.192 and 40 C.F.R. 270.65(b), that the commission waive the permit application and permit issuance requirement for this new technology. In waiving this requirement, we would be allowed to treat RCRA listed hazardous waste in this facility by mid-March.

We are submitting this Class 3 Permit Modification along with another request (letter attached), but under separate cover because of the sensitivity of the information included with this submittal. This new

Mr. Allen Beinke
October 24, 1991
Page 2

technology was developed by the Texaco Research & Development Department (TRDD). We are requesting under 31 T.A.C. 305.46 and 40 C.F.R. 270.12 that the information be kept confidential due to patents pending on the HRSR.

As you are aware, there is limited treatment capacity for the many wastes subject to land disposal restrictions. As such the cost to treat these wastes to the Best Demonstrated Available Technology (BDAT) standards for land disposal is very high. The HRSR, when proven, could provide an economical alternative for the treatment of hazardous waste. The HRSR could serve as part of the solution to waste management and treatment problems facing refineries and other industries.

We are confident that the process will not only treat listed hazardous waste to the BDAT standards, but it will also assist in waste minimization efforts not only in the hazardous waste arena, but also in the treatment of solid and municipal waste. This will be a low cost treatment technology with the additional benefit of reducing the volume of waste destined for landfill disposal. Appendix I includes a plot plan and a block flow diagram of the HRSR process. Appendix II contains a description of the process. The unit is completely enclosed, consisting of several totally enclosed vessels and tanks. After evaluation of this information, we think you will agree that the unit is designed to avoid adverse impact on the environment.

The objective of this research project is to :

- 1) Determine the optimal process (operating) conditions that will maximize degradation rates for various wastes;
- 2) Evaluate the unit to minimize the reactor equipment costs;
- 3) Collect environmental emission data to aid in permitting commercial units;
- 4) Demonstrate the efficiency of this sludge treatment technology;
- 5) Develop the optimum conditions to minimize the solids destined for ultimate disposal;
- 6) Determine the toxicity reduction capabilities of the process; and
- 7) Evaluate the applicability of this unit for treating biosolids, oily waste and refinery listed hazardous waste.

The first phase of the experiment will be the treatment of the waste identified on our Notice of Registration (NOR) as Waste Number 008, Wastewater Treatment Sludge, Class II Nonhazardous, Code 249700. The test period is expected to last approximately four(4) months beginning in November 1991. The solids generated from this facility will be

Mr. Allen Beinke
October 24, 1991
Page 3

disposed of on our on-site land treatment unit or at an approved off-site landfill. We feel this phase could be critical for the estimated 15,000 POTW in the United States which generate approximately 7.7 million tons of sludge which go to landfills (February 6, 1989 Federal Register). This unit could yield a economical reduction of the waste generated by these facilities; a reduced volume of materials being sent for disposal; reduce the use of municipal landfill space; and yield the ability for the cities to spend the funds previously used for other pertinent programs.

Additional wastes that are candidates for disposal and treatment and which may be treated in the HRSR are:

Waste No.	Description	Class	TWC Code
005	Tank Bottoms, Crude Oil	II	250810
013	Tank Bottoms, Still Bottoms	II	250060
034	Clay, Spent Treating	II	279090
037	Clay, Oil Containing	II	279810
048	Tank Bottoms, Gasoline	II	248420
050	Tank Bottoms, Intermediate & Products w/o Additives	I	150820
051	Tank Bottoms, Intermediate & Products with Additives	I	150830
062	Oil Sludge, Heavy	I	150430
072	Tank Bottoms, Diesel	II	248390
075	Tank Bottoms, Petroleum Products	II	252940

Pending your approval, we project the second phase of the experiment to begin in March 1992 and will include the treatment of the following waste identified on our NOR:

Waste No.	Description	Class	TWC Code	EPA Code
018	API Separator Sludge	IH	949400	K051
078	Slop Oil Emulsion Solids	IH	952080	K049

The test period is expected to last from March 1992 to March 1995. If you deem it necessary, we will seek annual renewals to this request under 31 T.A.C. 305.194. The solids generated from this facility which are expected to meet BDAT treatment standards will be sent to an off-site RCRA land disposal facility. Following completion of this experiment, all wastes will be removed and the facility decontaminated. No post-closure care will be necessary. Should the experiment prove successful we will define options for project development, evaluate permitting requirements for continued use thereafter or construction of a commercial size unit.

We currently have a permit for the operation of several units and are operating several other units under interim status. The existing

Mr. Allen Beinke
October 24, 1991
Page 4

general facility standards, preparedness and prevention requirements, contingency procedures, reporting and record keeping, and financial requirements as applied to these units will be (as seen applicable) used for this unit.

We believe this project has merit and could prove to be an economical treatment for municipal waste, oily waste, refinery listed wastes and potentially other listed oily wastes. We employ you to waive the permit application requirement and allow us to begin this experimentation in the first calender quarter of 1992.

We welcome the opportunity to meet with you and your staff to discuss this project once you have reviewed this information. Your immediate evaluation and response is requested and appreciated. Should questions arise, please contact Odessa R. Marshall at (409) 989-7166 or Dennis J. Brown (409) 989-7172.

Yours very truly,

STAR ENTERPRISE

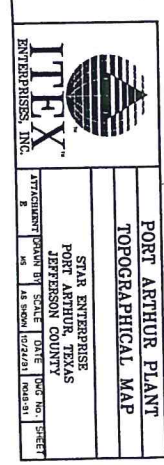
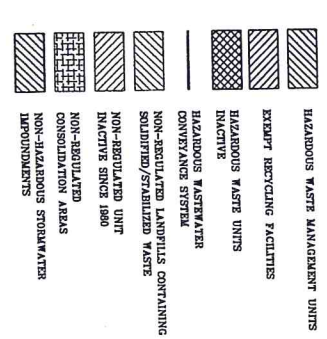
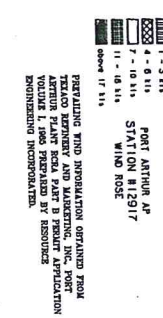
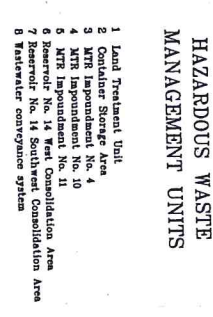
L. T. Townsend

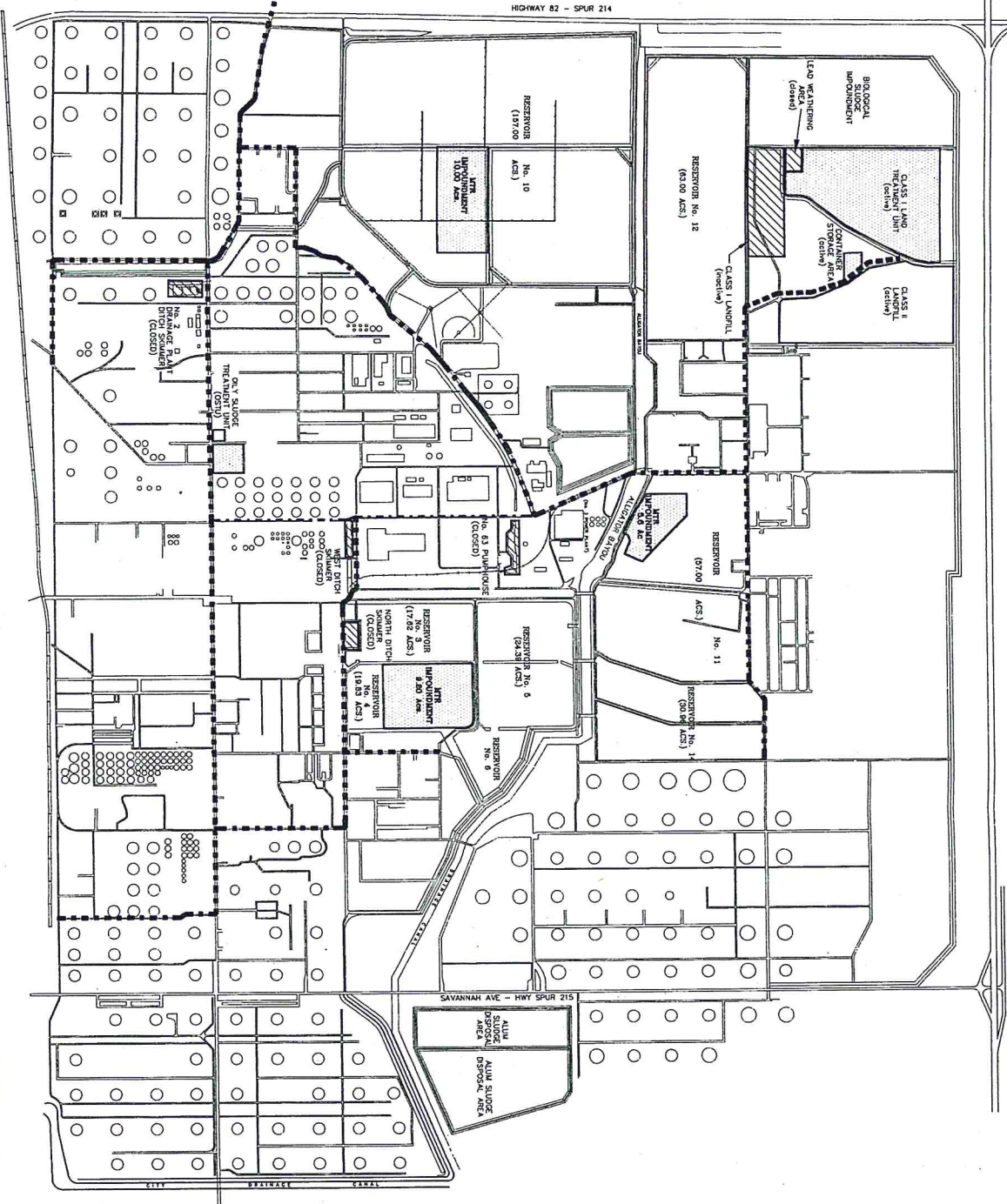
:orm

cc: Robert Layton, EPA, Dallas, TX

Attachments

cc: Minor Hibbs, TWC, Austin, TX





REF. No. 285

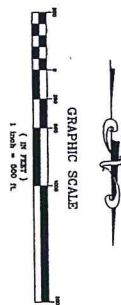


**TYPICAL TRAFFIC ROUTES FOR
INTERNAL WASTE MOVEMENT**

STAR ENTERPRISE
FORT ARTHUR, TEXAS
JEFFERSON COUNTY

ATTACHMENT B-1-1-1 SCALE DATE DWG No. SHEET
1"=500' 9-13-80 049-444 1 OF 1

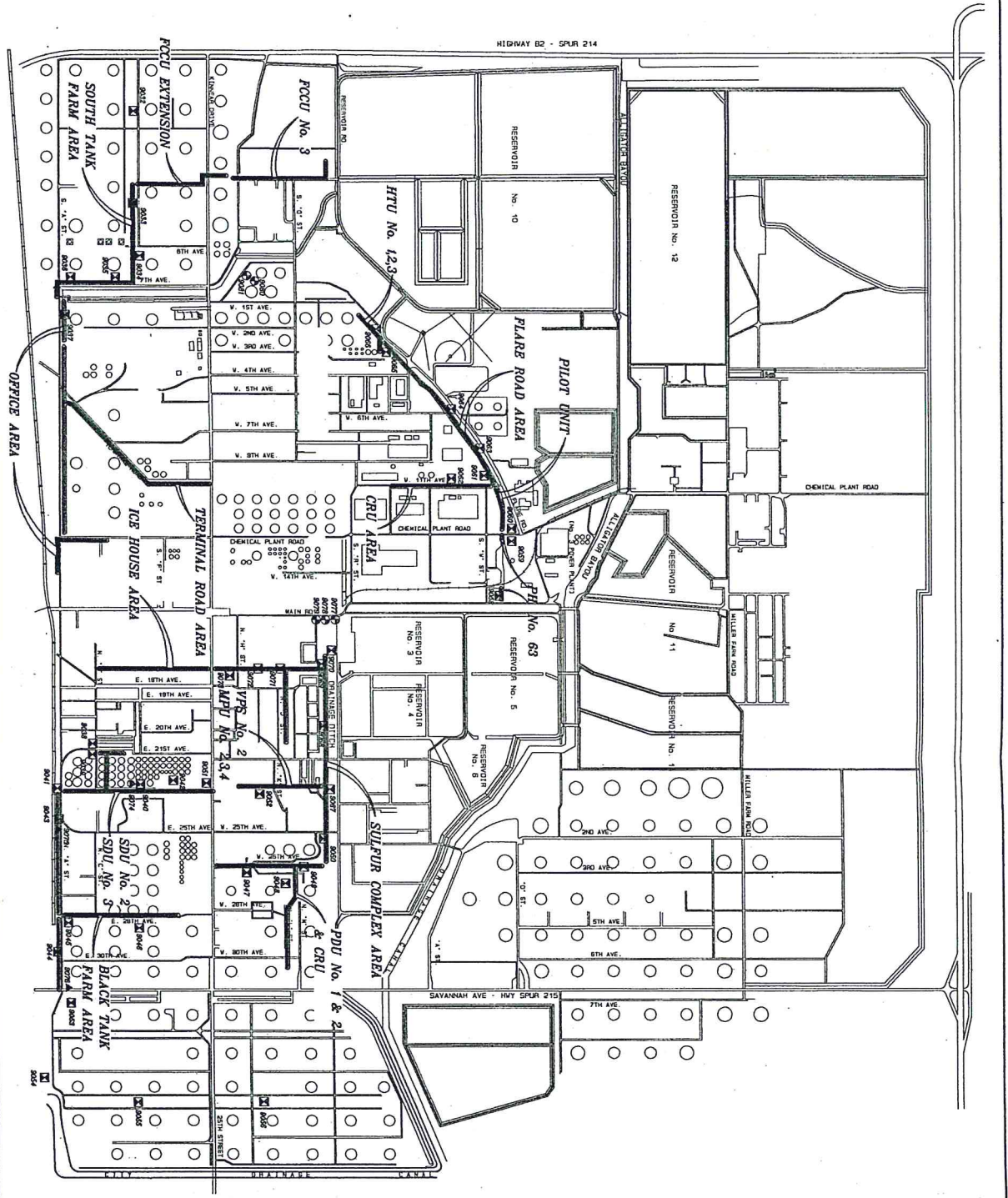
- LOCATION OF ACTIVE HAZARDOUS WASTE FACILITY COMPONENTS
- LOCATION OF INACTIVE OR CLOSED FACILITY COMPONENTS
- INTERNAL WASTE MOVEMENT ROUTES



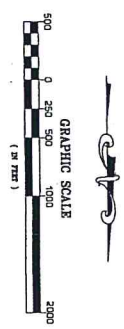


STAR ENTERPRISE
PORT ARTHUR REFINERY
WASTEWATER CONVEYANCE SYSTEM
DRAYING
No. 1
STAR ENTERPRISE
PORT ARTHUR, TEXAS
JEFFERSON COUNTY

OWNER: ST. LOUIS
SCALE: AS SHOWN
DATE: 1984
PROJECT NO.: 1
SHEET NO.: 1 OF 1



- LEGEND**
- PRIMARY DITCH SELF-RISING PUMPS
 - PRIMARY DITCH LIFT STATION PUMPS
 - NORTH AND SOUTH AIR SEPARATOR PUMPS



DeLoach
Hurlbut

EPA REGION VI
HAZARDOUS WASTE
RCRA PERMITS BRANCH

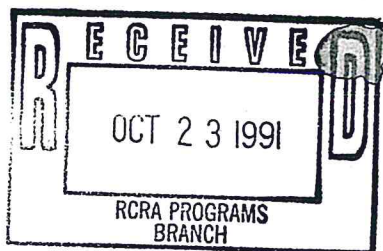
StarEnterprise

1991 OCT 29 PM 12:12

L T Townsend
Manager
Port Arthur Area



P O Box 712
Port Arthur TX 77641 0712
409 989 7001



October 14, 1991

Re: Experimental Hazardous Waste
Treating Unit Notification
EPA I.D. No. TXD008097529
Permit No. HW-50188-00
Solid Waste Registration No. 30121
ReTec Thermal Unit

Mr. Allen Beinke, Jr.
Executive Director
Texas Water Commission
P. O. Box 13087
Capitol Station
Austin, Texas 78711-3087

Dear Mr. Beinke:

This letter is in reference to my August 5, 1991 letter to you and your subsequent September 4, 1991 letter. Notification for accumulation areas was given in my March 30, 1990 letter (attached) to Mr. Dan Eden and in our Part B permit application Volume II, Section III-B. This additional notice will serve to further clarify our plans for accumulating solids from the subject facility and from other units.

We will place the solids from the subject facility in roll-off containers. The waste may be stored at either our permitted container storage facility, No. 14 on our Notice of Registration (NOR), or at an area adjacent to the location of the subject facility. The enclosed map (Y-138040) shows the plot plan for the subject unit and the location of the accumulation area. Under the latter scenario, the containers will be accumulated for less than 90 days in accordance with 31 TAC 335.69 and 40 CFR 262.34.

Mr. Allen Beinke, Jr.
Page 2
October 14, 1991

This accumulation area will be used to store up to 30 boxes of wastes. The area will accumulate wastes generated from the ReTec Thermal Unit, the CFS Solvent Extraction Unit, (reference our February 20, 1989 letter and your subsequent March 8, 1989 letter), the Oily Sludge Treatment Unit (No. 15 on our NOR), and potentially from other locations in the plant. The following wastes, as documented on our NOR, are those that will potentially be stored at this location:

Waste No.	Description	TWC Code
006	Tank Bottoms, Intermediate and Products without additives	950820
007	Tank Bottoms, Intermediate and Products with additives	950820
018	API Separator Sludges	949400 *
025	Alkaline Sludge	941180
029	Acid Sludge	940440
032	Caustic and Acid Sludge from Neutralization	941160
036	Heavy Oily Sludge	950430
038	Soil, Hydrocarbon Contaminated	979360
040	Oil and Water Sludges	949820
078	Slop Oil Emulsion	952080 *
076	Filter Cake, OSTU	985990 **
080	Filter Cloth, OSTU	985990 **
081	Spill Cleanup	978510

* This material may be generated at either the ReTec, CFS or Oily Sludge Treatment Units.

** These codes are listed on our NOR as 185990, but should begin with a "9". Waste number 080 should be filter cloth rather than cake as listed on our NOR.

Mr. Allen Beinke, Jr.

Page 3

October 14, 1991

The remaining wastes will either be generated at the Oily Sludge Treatment Unit or generated at other operations and potentially stored at this location. The storage location is approximately 90 ft. by 130 ft. and asphalt paved. The drainage from this facility is directed to our in-plant wastewater treatment facility.

Should questions arise, please contact O. R. Marshall at (409) 989-7166 or D. J. Brown at (409) 989-7172.

Yours very truly,

STAR ENTERPRISE

Signed: L.T.TOWNSEND/PML

:orm

cc: Minor Hibbs, TWC, Hazardous and Solid Waste Permits, Austin, TX
Keith Anderson, TWC, District VI, Beaumont, TX
Robert Layton, Jr., EPA, Region VI, Dallas, TX

Enclosures

March 30, 1990

Re: Solid Waste Registration No. 30121
Permit No. 50188
Port Arthur Plant (PAP)
ENV 1354

Mr. Dan Eden
Texas Water Commission
P. O. Box 13087, Capitol Station
Austin, Texas 78711

Dear Mr. Eden:

In accordance with 31 TAC 335.6, this is to notify you of a waste handling practice at the subject facility. Roll-off containers and drums may be temporarily placed adjacent to areas where waste will be generated. The container or drum will be used to store waste until it can be shipped offsite for recycling or disposal.

These sites are for accumulation where the material is stored for less than 90 days. The storage areas are not stationary nor are they located at one particular site. The locations may be near a tank, near an operating unit, near the lab and so forth. Any of the waste listed on the Notice of Registration could potentially be stored in these containers.

Should questions arise, please contact Odessa Marshall at (409) 989-7166.

Yours very truly,

STAR ENTERPRISE

SIGNED: L. T. TOLAND/MJK

:orm

cc: Mr. Glenn Davis, TWC, Austin, Tx
Mr. Keith Anderson, TWC, Beaumont, TX
Mr. Leon Byrd, TWC, Austin, Tx

Y-138040 -

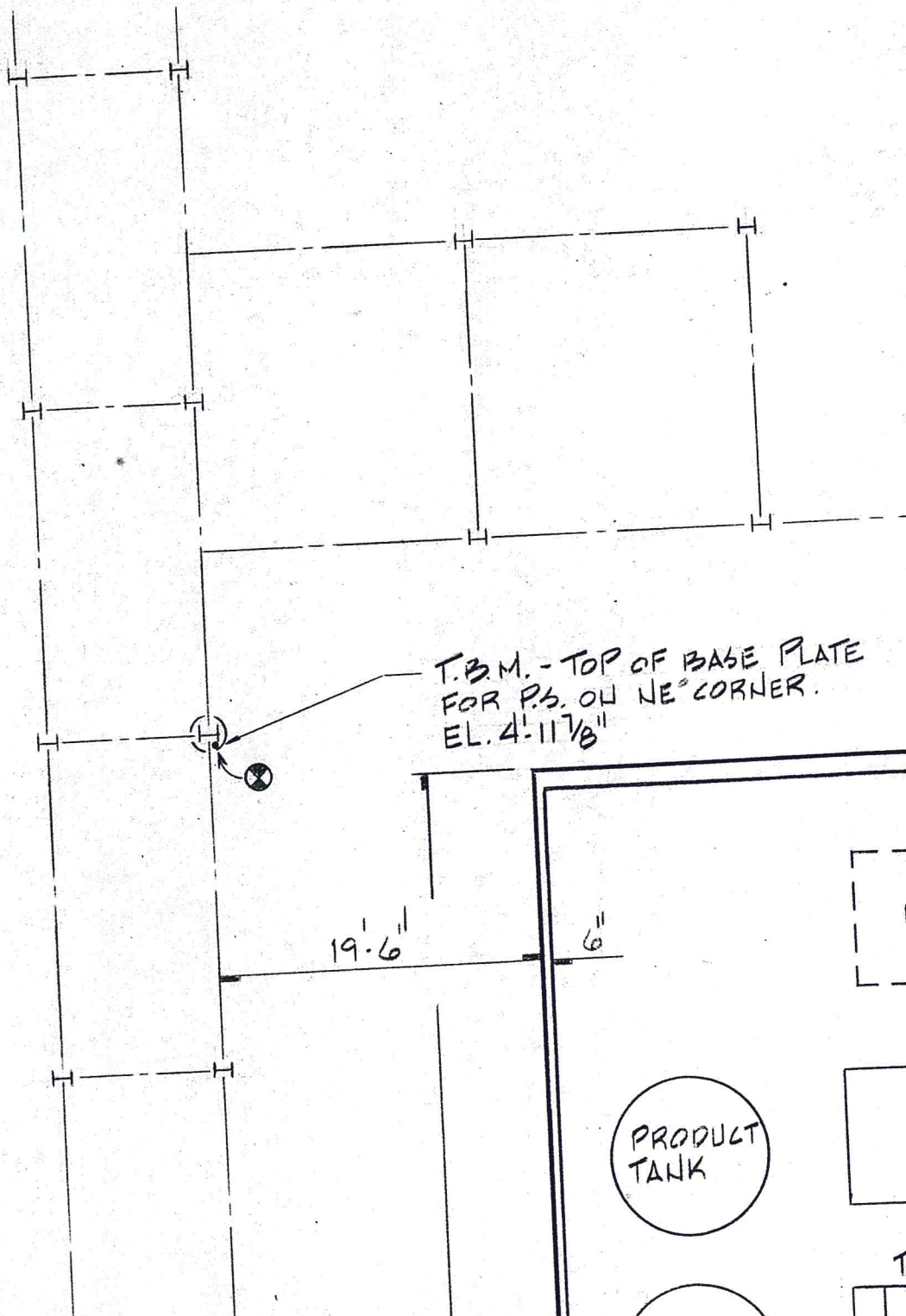
REVISION



A

B

C



D

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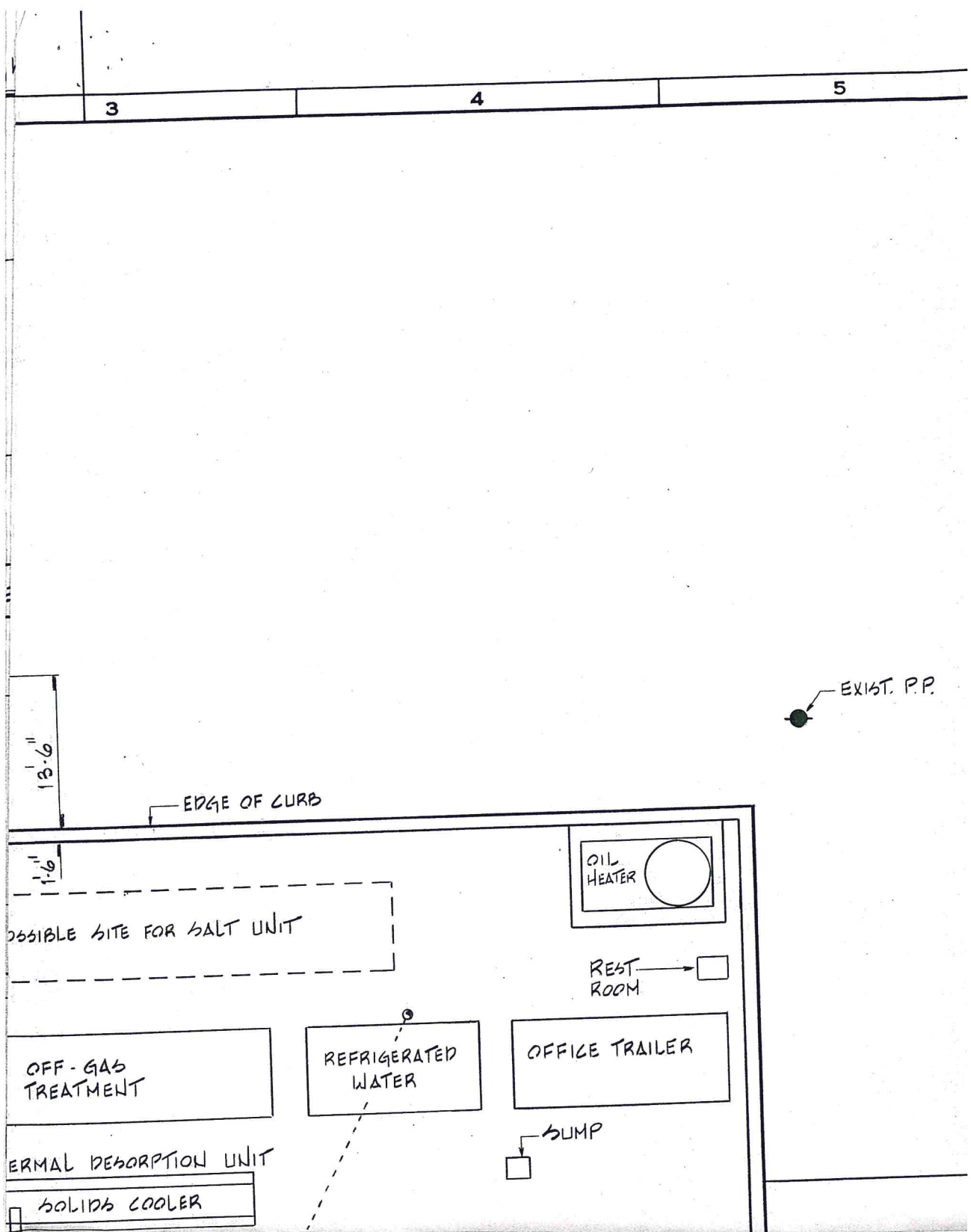
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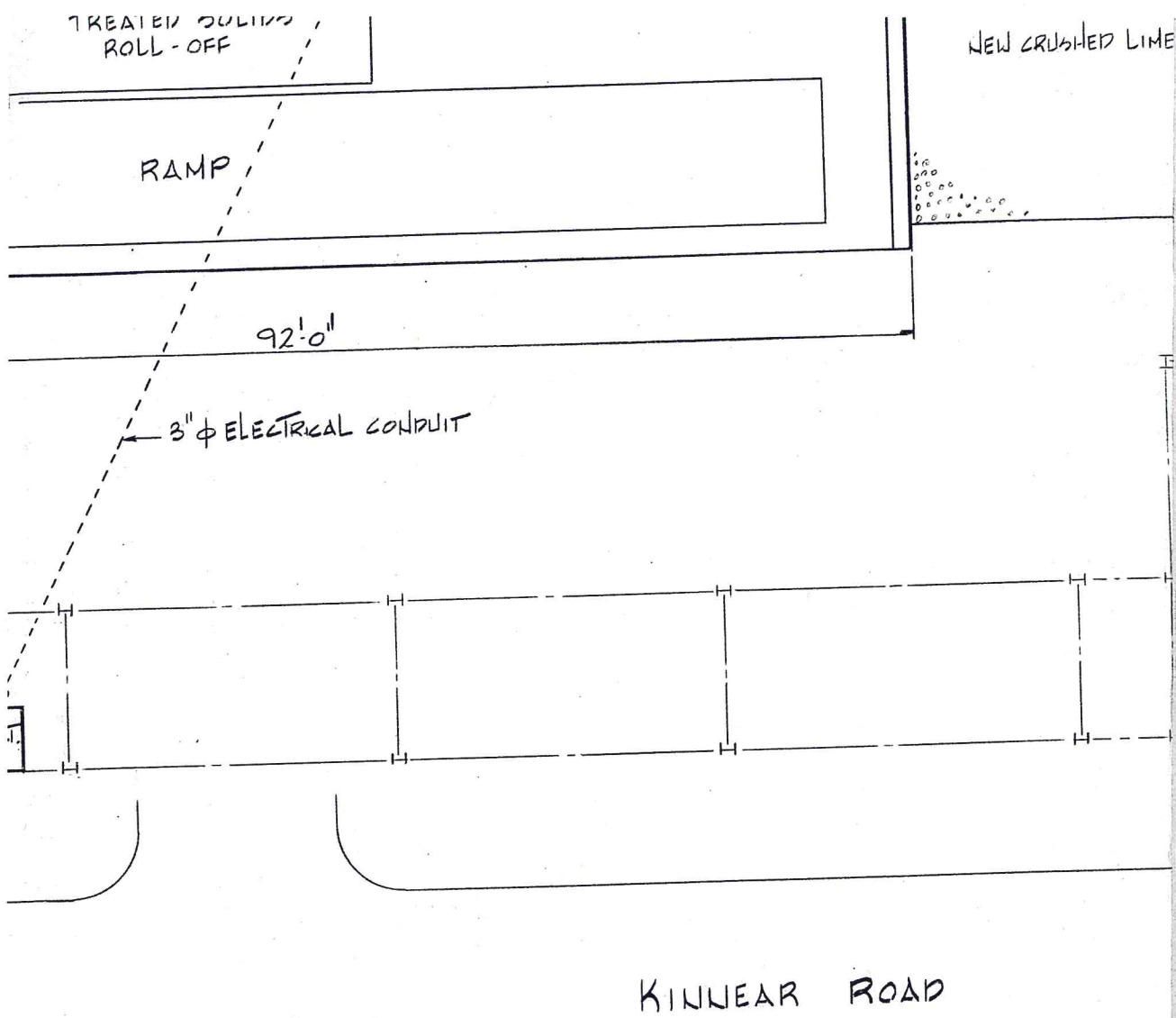
FEED
HOPPER

25'-0"

P

SCALE : 1'



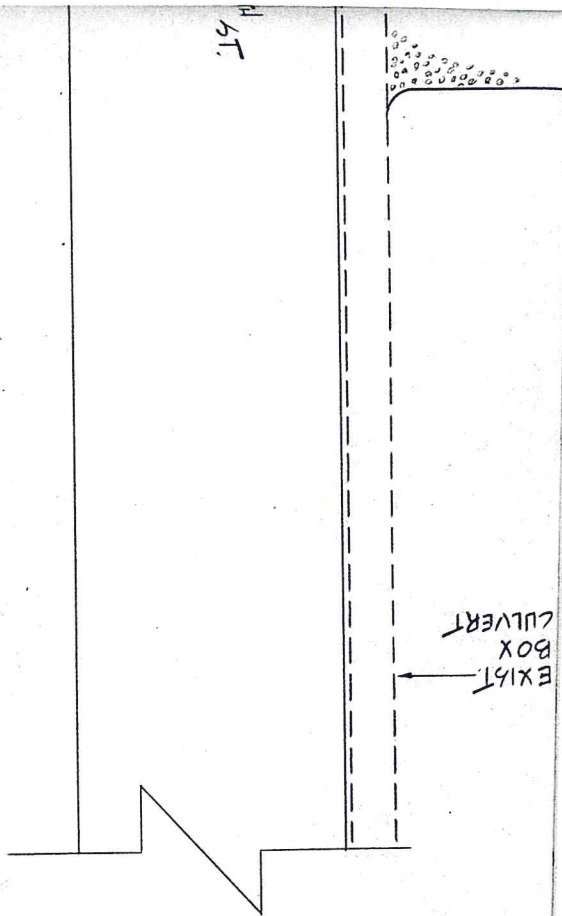


0'0" PLAN

8	7	6	
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REFERENCE DRAWINGS

- Y-138041 - CONCRETE FOUNDATION PLAN & 4" DRILL RODS
- Y-138042 - CONCRETE SECTIONS & BUMP DETAIL
- Y-138043 - RETAINING WALL SECTIONS

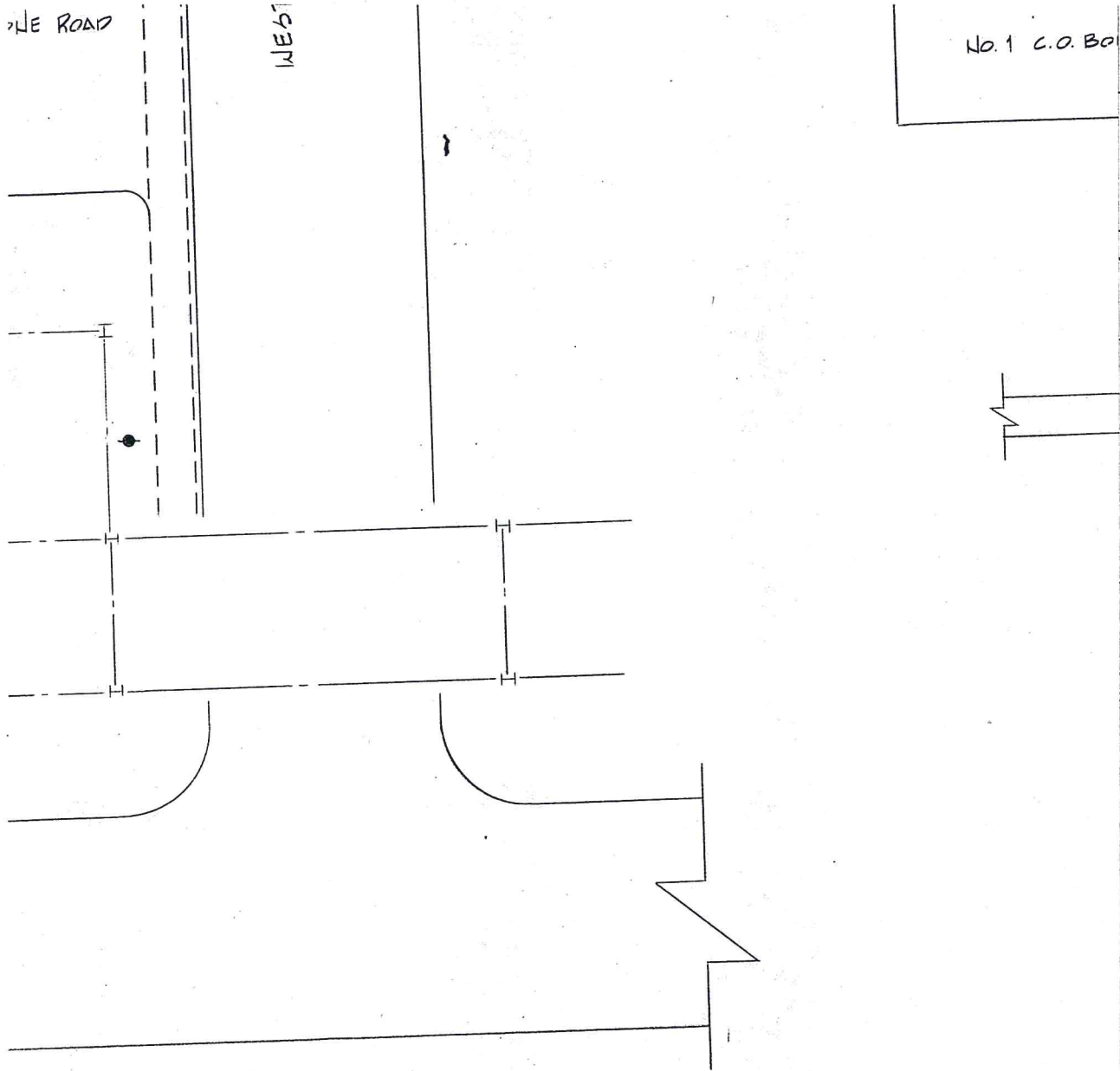


NO. 2 C.O.B.C.

THE ROAD

WEST

No. 1 C.O. Bo

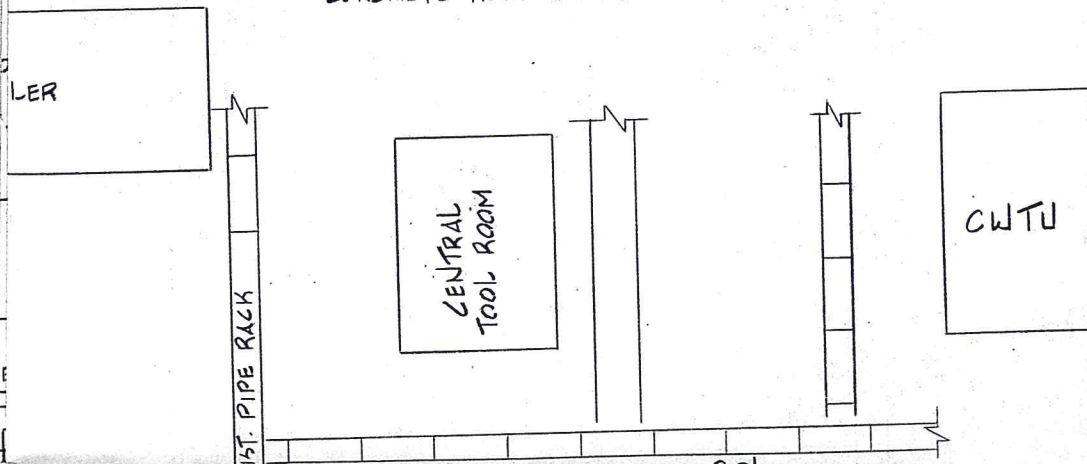


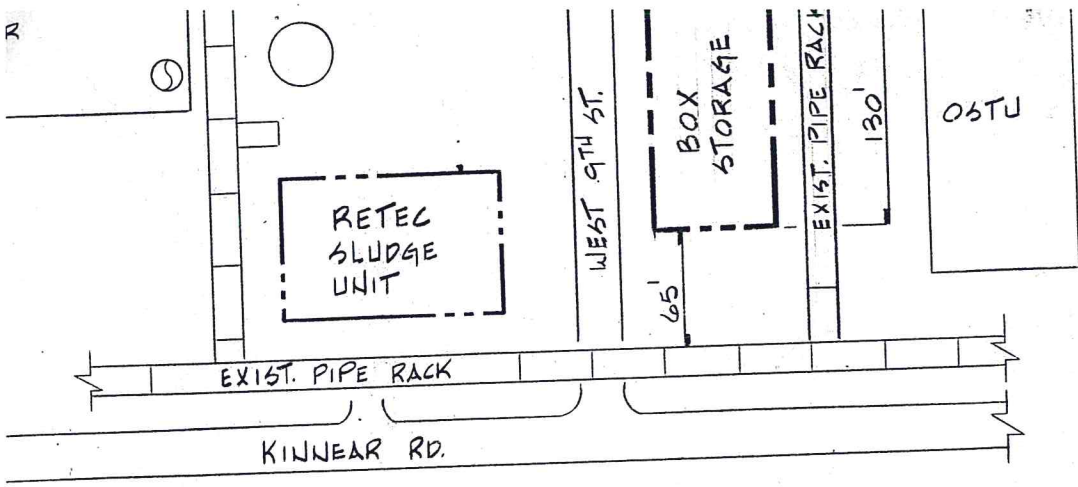
				APPROVED	DATE
BY	DATE	REVISIONS	NO.		

CONCRETE NOTES

1. ALL MATERIAL TO BE FURNISHED, FABRICATED AND INSTALLED BY CONTRACTOR UNLESS NOTED.
2. CONCRETE CONSTRUCTION SHALL CONFORM TO TEXACO GEMS A-1D AND A-1P.
3. ALL CONCRETE TO HAVE A MINIMUM 3000 PSI COMPRESSIVE STRENGTH AFTER 28 DAYS.
4. ALL CONCRETE TO HAVE A SLUMP OF 3" TO 5" AND SHALL HAVE A MINIMUM OF 5 SACKS OF CEMENT PER CU. YD.
5. FABRICATION & PLACEMENT OF REINFORCING STEEL & INSTALLATION OF CONCRETE TO BE IN ACCORDANCE WITH ACI BUILDING CODE 318-83.
6. REINFORCING STEEL SHALL CONFORM TO ASTM A-615 GR.60 DEFORMED & BE TIED AT ALL INTERSECTIONS WITH 18 GA. BLACK ANNEALED TIE WIRE. WELDED WIRE FABRIC SHALL CONFORM TO ASTM A-185 GR.60.
7. EXPOSED SURFACES OF CONCRETE SHALL BE KEPT IN A MOISTENED CONDITION FOR A PERIOD OF 7 DAYS OR TREATED WITH AN APPROVED CURING COMPOUND.
8. ALL FILL MATERIAL TO BE COMPACTED TO 95% STANDARD PROCTER DENSITY PER GEMS A-2P.
9. ALL EXPOSED EDGES OF CONCRETE TO HAVE A 3/4" CHAMFER.

10. EXIST. GROUND AT LOCATION OF NEW CONCRETE SLAB TO BE EXCAVATED TO EL. 4'0" IF GROUND IS LOWER THAN REQUIRED ELEVATION, ADD COMPACTED SAND OR LIMESTONE TO MAKE LEVEL.
11. SLOPE TOP OF CONCRETE SLAB TOWARDS SUMP TO EL. SHOWN ON SUMP DETAIL, DWG. Y-138042. MAINTAIN PROPER THICKNESS OF SLAB.
12. ENTIRE AREA OF CONCRETE FOUNDATION TO BE UNDERLAID WITH HIGH DENSITY POLYETHYLENE (HDPE) 60 MIL THICK PRIOR TO THE INSTALLATION OF SAND & CONCRETE REINFORCEMENT.





LOCATION PLAN

N.T.S.

NOTICE

THIS DRAWING AND THE INFORMATION HEREIN CONTAINED ARE THE PROPERTY OF Star-Enterprise WHICH HAS FURNISHED THEM IN CONFIDENCE UPON THE UNDERSTANDING AND CONDITION THAT ALL PERSONS, FIRMS OR CORPORATIONS RECEIVING SUCH DRAWING AND INFORMATION SHALL BY THE ACT OF RECEIVING THEM BE DEEMED TO HAVE AGREED; TO MAKE NO COPY, DUPLICATION, DISCLOSURE OR USE WHATSOEVER OF ALL OR ANY PART THEREOF EXCEPT AS EXPRESSLY AUTHORIZED IN WRITING BY StarEnterprise NOT TO GIVE, LEND OR OTHERWISE DISPOSE OF THIS DRAWING; AND TO RETURN THIS DRAWING PROMPTLY UPON REQUEST.



StarEnterprise

Port Arthur Plant

EAST OF CENTRAL TOOL ROOM
SLUDGE THERMAL DRYING UNIT
CONCRETE FOUNDATION
PLOT AND LOCATION PLAN

CHARGE	B. M.	DATE

INITIALS	DATES	SCALE AS NOTED
DRAWN BY: TLH.	4-91	NUMBER ASSIGNED AND TRACING RECORD ENTERED
DESIGN BY: LOS	4-91	
CHECKED BY: LOS	4-91	
		DATE 4-17-91
		Y-138040

SAFETY---A LIFETIME COMMITMENT

SAFETY--

SAFETY---A LIFETIME COMMITMENT

SEP 1991

RCRA RECORD CENTER
Infiling Cover Sheet

NAME Jar Green

MAIL CODE 6EN-HT

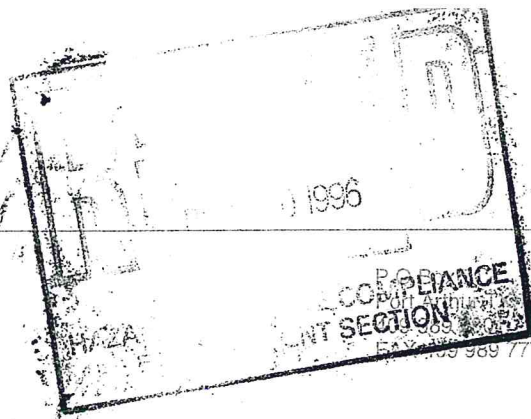
PHONE 5-7509

DATE 1-13-97

EPA I.D.#	FACILITY NAME	TYPE FILE
UNKNOWN TXD 008097529 (PORT ARTHUR FACILITY)	STAR ENTERPRISE	RCRA -NT

StarEnterprise

Michael J Killien
Plant Manager



December 4, 1996

Re: Compliance Waiver for Subpart CC (40 CFR 264 and 265)

P 297 625 372

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Regional Administrator
Environmental Protection Agency
1445 Ross Avenue
Dallas, TX 75202

RECEIVED
DEC 12 1996
RCRA ENFORCEMENT
TEXAS SECTION

Dear Sir:

Pursuant to 40 CFR 265.1082 Subpart CC, Star Enterprise is submitting this compliance plan and is requesting an extension from December 6, 1996 to December 8, 1997 for compliance.

Star Enterprise operates storage areas for hazardous wastes in containers of greater than 0.46 m3 (122 gallons). No stabilization is done in these containers. Star generates its subject waste on a non-continuous basis. During the time from December 6, 1996 to December 8, 1997, Star will sample, as required by 40 CFR 265 Subpart CC, all subject wastes for volatile organics (VO) content. Any containers found to contain hazardous wastes with greater than 500 ppm VO will be stored and transported in DOT approved roll-offs with tarps secured over the container top. Any containers will be monitored by Method 21 for VO while stored or during filling.

If there are any questions concerning this plan, please contact Ms. D. L. Asbury or Mr. J. L. Castille of my staff at (409) 989-7902 and (409) 989-7063, respectively.

Very truly yours,

STAR ENTERPRISE

:rmd

cc: Mr. Dan Pearson, Executive Director, TNRCC, Austin, TX

Barry R. McBee, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Dan Pearson, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

June 4, 1997



Bill Gallagher, Chief
Oklahoma/Texas Section
U. S. Environmental Protection Agency
Region VI - 6PD-O
1445 Ross Avenue
Dallas, TX 75202

RE: Star Enterprise - Port Arthur Plant
Industrial Solid Waste Registration No. 30121
Hazardous Waste Permit No. HW-50188
EPA ID No. TXD008097529

Dear Mr. Gallagher:

Enclosed with this letter are revisions to the Class 3 permit modification received by the Texas Natural Resource Conservation Commission on May 14, 1997. The proposed modification has been requested for Star Enterprise, Hazardous Waste Permit No. HW-50188.

Please address any comments to Ms. Jan Bates. She may be contacted at (512) 239-6627. When responding by mail, please be sure to use mail code 130 (MC 130).

Sincerely,

A handwritten signature in cursive script, appearing to read "Susie Frizlen".

Susie Frizlen
Logistics & Data Management Team
Permits Section, I & HW Division

SF/rlb

Enclosure

StarEnterprise

Michael J Killien
Plant Manager



P O Box 712
Port Arthur TX 77641-0712
409 989 7001
FAX 409 989 7774

May 6, 1997

Re: Star Enterprise Port Arthur Plant
Hazardous Waste Permit No. HW-50188,
Solid Waste Registration No. 30121,
EPA I.D. No. TXD008097529,
Revisions to Delay Of Closure Application Submitted July 1, 1994, for
MTR Cells 4 & 10

Z 203 941 671

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Ms. Jan Bates, PE

MC130

Facility Team IV, Permits Section

Industrial and Hazardous Waste Division

Texas Natural Resource Conservation Commission

P. O. Box 13087

Austin, Texas 78711-3087

*BATES
KEY - 11462
TRACK #2/
MOD.*



Dear Ms. Bates:

Please find attached a revised Delay of Closure application. The revisions are necessary because Star Enterprise will continue to utilize cell 1 from both MTR number 4 and 10 for the management of stormwater from non-process areas.

If you need any further information or if you have any questions please call Jim Raithel at (409) 989-7111.

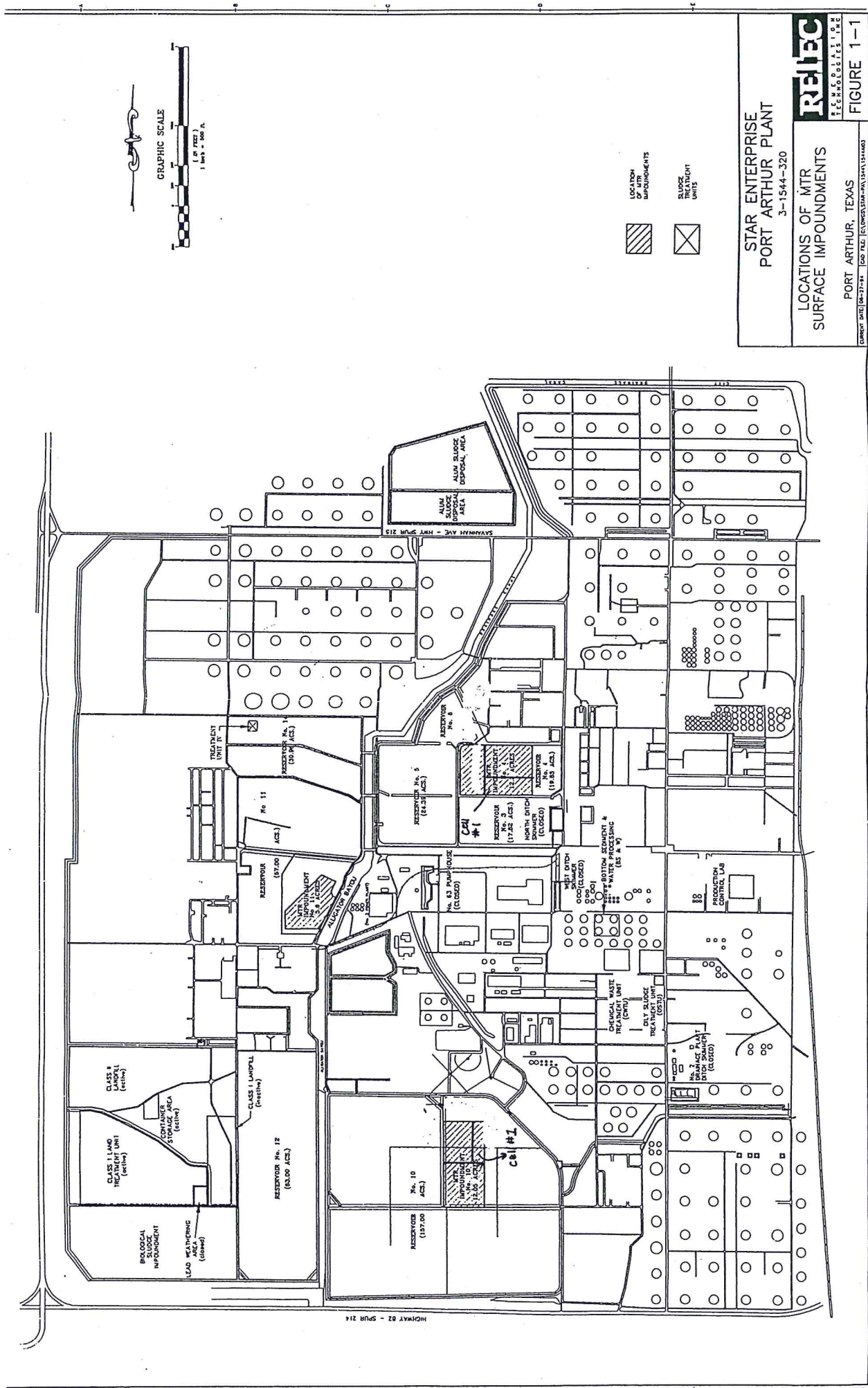
Yours very truly,

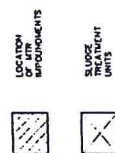
STAR ENTERPRISE

MJ Killien/ufc

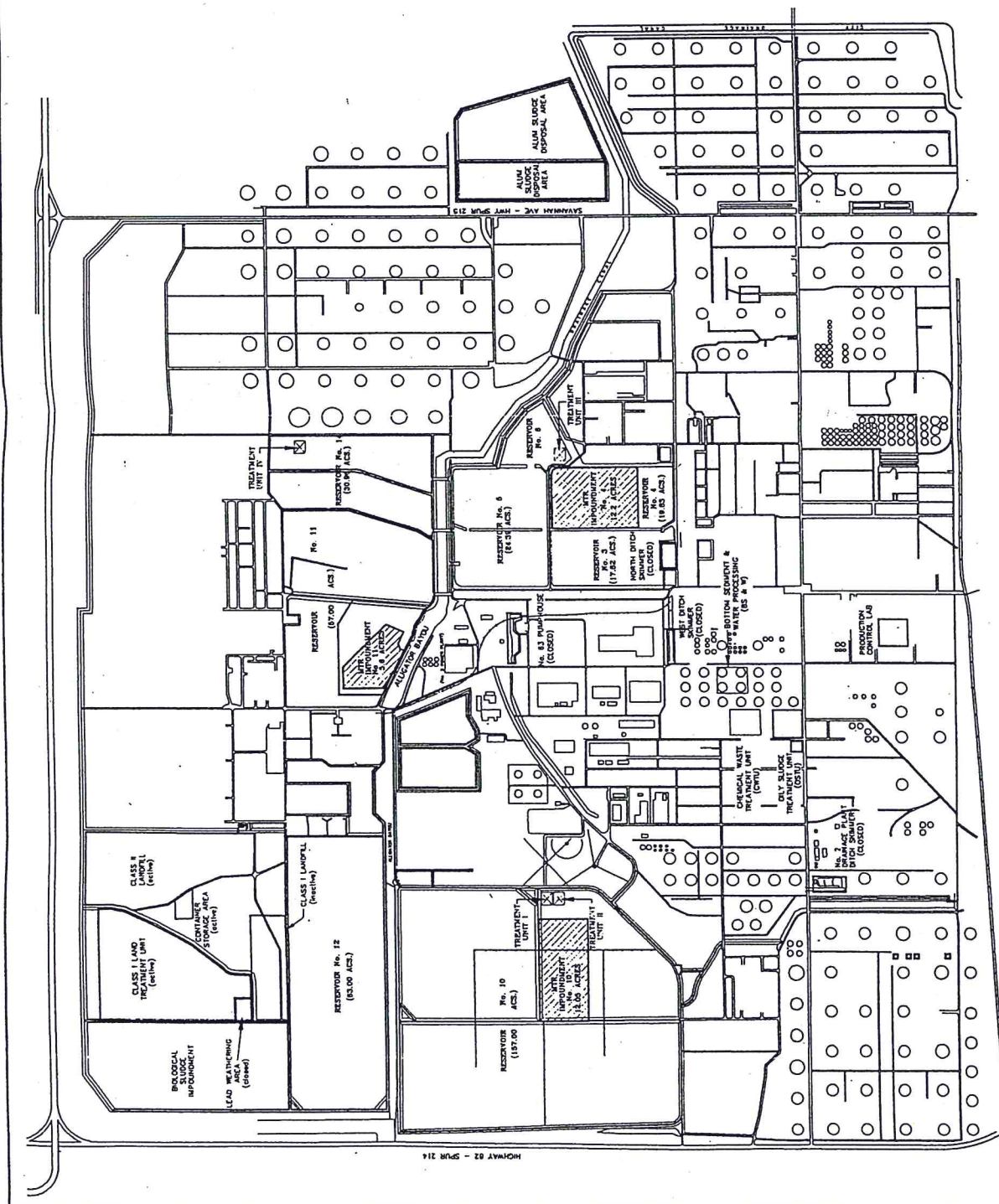
:BPH

Attachments





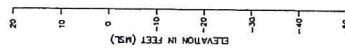
LOCATION OF MTR	IMPOUNDMENTS	STAR ENTERPRISE PORT ARTHUR, TEXAS JEFFERSON COUNTY	FIGURE No. 81-5-1	SCALE 1" = 50'	DATE 1-11-81	DWG No. 049-818	SHEET 1 OF
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PLANT SOUTH

A

WELL-3

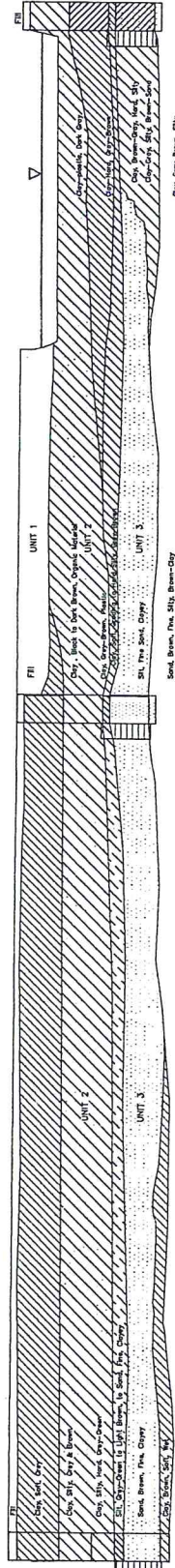
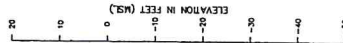


PLANT NORTH

A¹

WELL-1

RESERVOIR No. 14



LEGEND

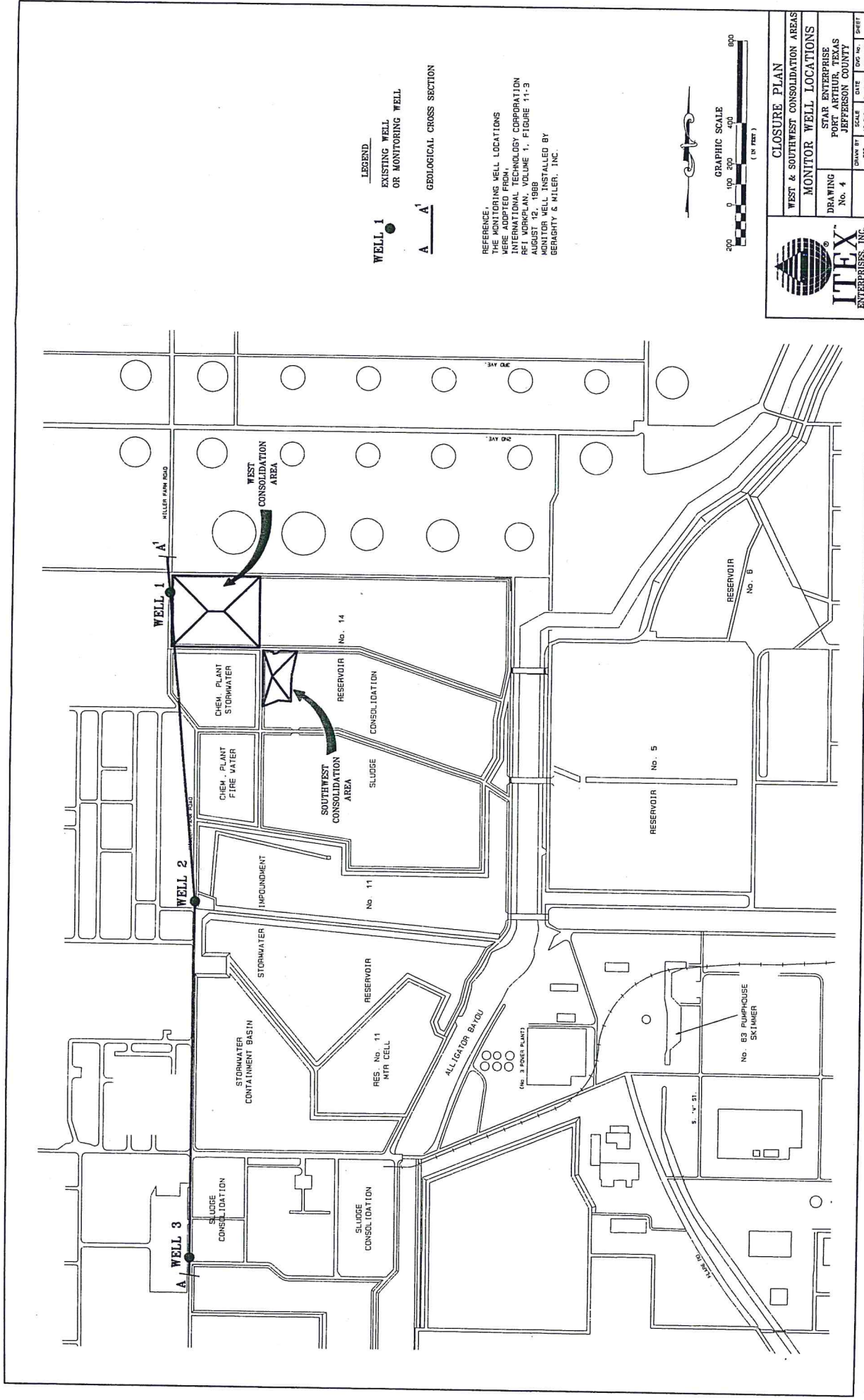
- SCREEN INTERVAL
- FILL
- CLAY
- CLAY, SILTY TO SANDY
- SAND
- SURFACE IMPONEMENT FLUID LEVEL (MSL)
- MONITOR WELL LOCATION (WELLS INSTALLED BY GEAUCHY & MILLER)

NOTE VERTICAL EXAGGERATION = 10X
 DATA RELATING TO SURFACE CONDITIONS HAVE BEEN
 OBTAINED FROM BORING LOCATIONS ONLY. ACTUAL CONDITIONS
 BETWEEN BOREHOLE LOCATIONS MAY DIFFER FROM THOSE SHOWN HERE.
 THIS CROSS SECTION IS FOR INFORMATION ONLY. IT IS NOT TO BE
 SUBMITTED AS THE BASIS FOR ANY PERMIT APPLICATION.
 VOLUME II, SECTION V, 1985



CLOSURE PLAN

WEST & SOUTHWEST CONSOLIDATION AREA	
GEOLOGICAL CROSS SECTION	
DRAWING No. 3	STAR ENTERPRISE
	PORT ARTHUR, TEXAS
	JEFFERSON COUNTY
SCALE NTS	DATE
	10-15-80 010-R22
	5

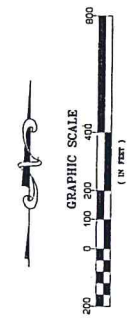


LEGEND

WELL 1 ●
EXISTING WELL
OR MONITORING WELL

A — A' —
GEOLOGICAL CROSS SECTION

REFERENCE:
THE MONITORING WELL LOCATIONS
WAS OBTAINED FROM
A REPORT SUBMITTED BY
INTERTECHNOLOGY CORPORATION
REF. VORPLAN VOLUME 1, FIGURE 11-3
AUGUST 12, 1988
MONITOR WELL INSTALLED BY
BERAGHTY & MILLER, INC.



CLOSURE PLAN

WEST & SOUTHWEST CONSOLIDATION AREAS

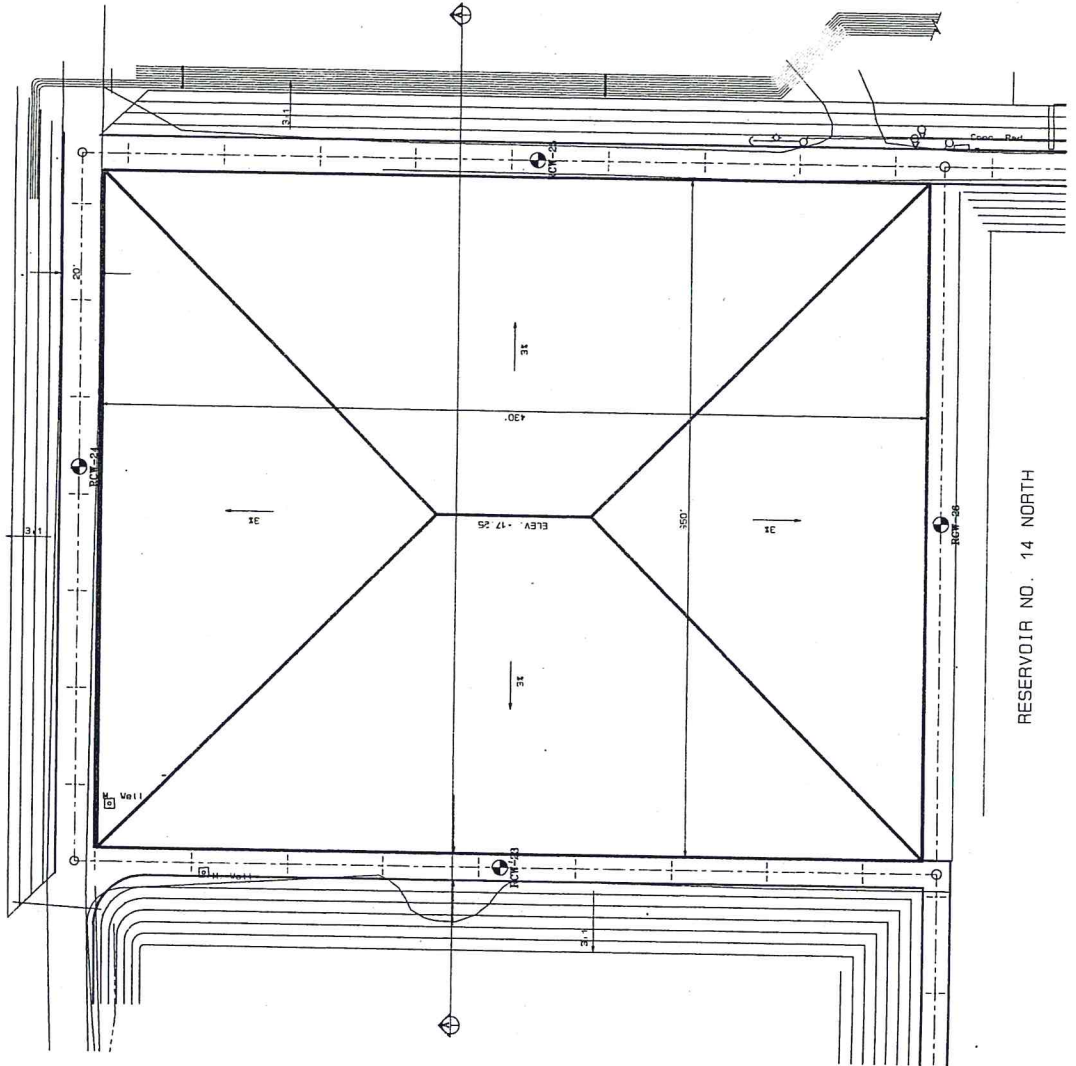
MONITOR WELL LOCATIONS

DRAWING No. 4

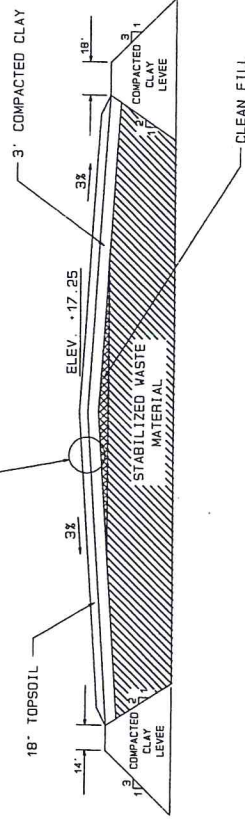
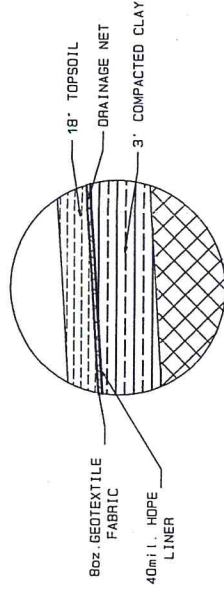
STAR ENTERPRISE
PORT ARTHUR, TEXAS
JEFFERSON COUNTY

DATE	10/2/81	SHEET	1
SCALE	AS SHOWN	DWG. NO.	104-178

MILLER TANK FARM ROAD

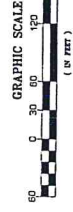


RESERVOIR NO. 14 NORTH



SECTION A-A PROPOSED CAP DESIGN

PROPOSED RCRA COMPLIANCE GROUNDWATER MONITORING WELL.



CLOSURE PLAN	
WEST CONSOLIDATION AREA	
CAP DESIGN	
DRAWING No. 5	STAR ENTERPRISE PORT ARTHUR, TEXAS JEFFERSON COUNTY
DATE 12/23/2011	DWG No. 1400-33
SCALE 1" = 30'	SHEET 1 OF 1



Hurlbut 6H

StarEnterprise

L T Townsend
Manager
Port Arthur Area



P O Box 712
Port Arthur TX 77641 0712
409 989 7001

March 21, 1991

Re: Class 3 Permit Modification
Port Arthur Plant (PAP)
TWC Permit No. HW-50188-000
EPA I.D. No. TXD008097529
ENV 1310

RECEIVED
1991 MAR 26 AM 9:12
EPA REGION 1
HAZARDOUS WASTE
COMPLIANCE SECTION

Mr. Allen Beinke
Executive Director
Texas Water Commission
P. O. Box 13087, Capitol Station
Austin, TX 78711-3087

Attention: Mr. Minor Hibbs, Section Chief
Hazardous and Solid Waste Permits Section

Dear Mr. Beinke:

Please find enclosed five (5) copies of a Class 3 Permit Modification for the permit referenced above. In addition, six amended copies of the Part B Section I (General Information) are included. This permit modification is necessary for the continued management of sludges which may exhibit newly identified hazardous characteristics due to TC benzene concentrations. These sludges are currently managed in a series of tanks within four sludge treatment units, and in three minimum technology requirement (MTR) surface impoundments.

This permit modification includes a modified Part A Permit Application which reflects changes in waste management activities at the facility since the Class 1 Permit Modification was submitted on September 25, 1990, which identified units managing TC hazardous sludges.

The sludge treatment tanks referred to in this permit amendment are operated in a batch treatment process so that the tanks operate under the less than 90 day accumulation time permitting exemptions. Therefore, we request that they be removed from further permitting requirements, and have modified this application accordingly. Also, Reservoir No. 11 which was submitted in the Class 1 Modification was deactivated prior to September 25, 1990. Therefore, this reservoir is undergoing closure as a non-hazardous unit, and the Class 3 modification reflects this.

Mr. Allen Beinke

Page 2

March 21, 1991

Should questions arise, contact Odessa Marshall at (409) 989-7166.

Yours very truly,

STAR ENTERPRISE

Signed: L. T. TOWNSEND

ORM:JMBs

cc: Keith Anderson, TWC, District VI, Beaumont, TX
Robert Layton, Jr., EPA, Region VI, Dallas, TX

Enclosures

cc: Leon Byrd, TWC, Austin, TX
Sherry Pierce, ITEX, Dallas, TX

Deleif

StarEnterprise

L T Townsend
Manager
Port Arthur Area



P O Box 712
Port Arthur TX 77641 0712
409 989 7001

November 13, 1991

Re: Class 3 Permit Modifications
Star Enterprise - Port Arthur Plant
EPA I.D. No. TXD008097529
TWC Permit No. HW-50188-000
ENV 1381, 1310

Mr. Allen Beinke
Executive Director
Texas Water Commission
P. O. Box 13087, Capitol Station
Austin, TX 78711-3087

Attention: Mr. Minor Hibbs, Chief
Permits Section
Hazardous and Solid Waste Division

Dear Mr. Beinke:

Please reference the October 24, 1991 subject letters to you. These letters were for the transmittal of the Class 3 Permit Modification which addressed the Primary and Secondary Refinery Sludges Regulations and it's relationship to our facility, and the operation of a experimental treatment unit called the High Rate Sludge Reactor.

Pursuant to 31 Texas Administrative Code (TAC), Section 305.69(g) and 40 Code of Federal Regulations (CFR), Section 270.42(g), we have published a notice in the newspaper and mailed notices to the affected landowners, and applicable public officials and agencies. Attached, for your records, is a copy of the affidavit of publication recently received from the Port Arthur News and the notice mailed to the aforementioned parties.

EPA REGION VI
HAZARDOUS WASTE
RCRA PERMITS BRANCH
1991 NOV 29 PM 12:17

Mr. Allen Beinke
Page 2, 1991
November 13, 1991

Should questions arise, please contact O. R. Marshall at (409)
989-7166.

Yours very truly,

STAR ENTERPRISE

LT Townsend/cfw

:ORM

cc: Mr. Robert E. Layton, Jr., EPA, Dallas, TX
Mr. Keith Anderson, TWC, District VI, Beaumont, Tx
Steve Markussen, ITEX, Dallas, Tx
Leon Byrd, TWC, Austin, Tx

Attachments



Port Arthur

Texas Newspapers
A division of American Publishing Co., Inc.
Port Arthur, Texas

Affidavit of Publication

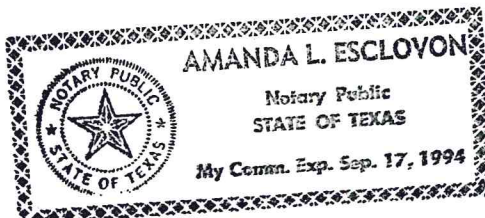
The State of Texas,
County of Jefferson,
City of Port Arthur.

Deborah Breaux being first duly sworn deposes and says:

That he is a resident citizen of Jefferson County, Texas and that he is of lawful age; that he is the Classified Rep. of the PORT ARTHUR NEWS, APAC-90 Texas Holdings, a division of American Publishing Co., same being a newspaper published and having a general circulation in the City of Port Arthur, Jefferson County, Texas; that said newspaper has been continuously and regularly published for a period of more than one year in Jefferson County, Texas, and that the advertising of Star Enterprise, was published in said newspaper in the issue of November 4, 1991, Ad # c503616, which were the regular publication days of said issues; and that said issues were actually published, circulated and distributed.

Deborah Breaux

SUBSCRIBED AND sworn to before me, this the 5 day of Nov, A.D. 1991.



Amanda L. Esclovon
Notary Public in and for Jefferson County, Texas

AND
PARTIES

You are hereby notified of the opportunity for written comment/once ing the Class 3 Modification/ requ of the Star Enterprise Texas H ardous Waste Permit Number F 50188-00. The location is east of Intersection of Spur 214 and High 73 in Port Arthur, Texas. The du tion of the comment period is 60 d from the date this notice is publis in the newspaper. The agency c tact person is Mr. Leon Byrd of Texas Water Commission at P Box 130876, Capitol Station, Au Texas 78711-3087, teleph number (512) 463-7935. The i mitee's compliance history during life of the permit being modifie available from the agency con person. A copy of the permit m fication and supporting documents available for review at the Star Enterprise Refinery. These docum may be reviewed during the 60 comment period by contacting Ms R. Marshall, Star Enterprise F representative at (409) 989-7166. Interested parties may review th materials and submit written c ments to the Texas Water Com sion by January 3, 1992. In add a public meeting will be held at Star Enterprise Employee's Buildir November 20, 1991 at 7:00 P. the Port Arthur Refinery.



P O Box 712
Port Arthur TX
77641 0712

NOTICE OF APPLICATION
CLASS III PERMIT MODIFICATION

Applicant:

Star Enterprise
P. O. Box 712
Port Arthur, Texas 77641-0712

TWC Permit No. HW-50188-000
TWC Registration No. 30121
EPA ID No. TXD 008097529

Location and Operation: Star Enterprise operates a petroleum refinery in Jefferson County. The facility is located east of the intersection of Spur 214 and Highway 73 in Port Arthur, Texas.

Remarks: An application for permit modification has been submitted to the Texas Water Commission (TWC) and the U.S. Environmental Protection Agency (EPA) in accordance with 31 Texas Administrative Code (TAC) 305.69(g) and 40 Code of Federal Regulations (CFR) 270.42(g). The modification concerns continued management of newly identified wastes as a result of the Petroleum Refinery and Secondary Oil/Water/Solids Separation Sludge (F037 and F038) regulations that were promulgated by the U.S. EPA on November 2, 1990; and for the operation of an experimental waste treatment unit.

Comment Period and Contacts: This notice announces the start of a 60-day comment period which ends January 3, 1991. Further information concerning the application may be obtained by contacting Ms. O. R. Marshall, Star Enterprise Representative, at (409) 989-7166 or by contacting Mr. Leon Byrd at the TWC at (512) 463-7935. The permittee's compliance history during the life of the permit being modified is available from the agency contact person. Written comments must be sent within the 60-day period, and may be addressed to Mr. Minor Hibbs, Chief of Permits Section & Solid Waste Division, Texas Water Commission, P. O. Box 13087, Austin, Texas 78711.

Document Availability and Public Meeting: A copy of the permit modification can be viewed at the Star Enterprise Refinery on weekdays by scheduling an appointment with the refinery contact. A public meeting to receive comments will be held at the Star Enterprise Employee's Building on November 20, 1991 at 7:00 PM. If you are interested in reviewing the permit application or attending the public meeting, please contact Ms. O. R. Marshall, Star Enterprise Representative, at (409) 989-7166.



P O Box 712
Port Arthur TX
77641 0712

NOTICE OF APPLICATION
CLASS III PERMIT MODIFICATION

Applicant:

Star Enterprise
P. O. Box 712
Port Arthur, Texas 77641-0712

TWC Permit No. HW-50188-000
TWC Registration No. 30121
EPA ID No. TXD 008097529

Location and Operation: Star Enterprise operates a petroleum refinery in Jefferson County. The facility is located east of the intersection of Spur 214 and Highway 73 in Port Arthur, Texas.

Remarks: An application for permit modification has been submitted to the Texas Water Commission (TWC) and the U.S. Environmental Protection Agency (EPA) in accordance with 31 Texas Administrative Code (TAC) 305.69(g) and 40 Code of Federal Regulations (CFR) 270.42(g). The modification concerns continued management of newly identified wastes as a result of the Petroleum Refinery and Secondary Oil/Water/Solids Separation Sludge (F037 and F038) regulations that were promulgated by the U.S. EPA on November 2, 1990; and for the operation of an experimental waste treatment unit.

Comment Period and Contacts: This notice announces the start of a 60-day comment period which ends January 3, 1992.* Further information concerning the application may be obtained by contacting Ms. O. R. Marshall, Star Enterprise Representative, at (409) 989-7166 or by contacting Mr. Leon Byrd at the TWC at (512) 463-7935. The permittee's compliance history during the life of the permit being modified is available from the agency contact person. Written comments must be sent within the 60-day period, and may be addressed to Mr. Minor Hibbs, Chief of Permits Section & Solid Waste Division, Texas Water Commission, P. O. Box 13087, Austin, Texas 78711.

Document Availability and Public Meeting: A copy of the permit modification can be viewed at the Star Enterprise Refinery on weekdays by scheduling an appointment with the refinery contact. A public meeting to receive comments will be held at the Star Enterprise Employee's Building on November 20, 1991 at 7:00 PM. If you are interested in reviewing the permit application or attending the public meeting, please contact Ms. O. R. Marshall, Star Enterprise Representative, at (409) 989-7166.

* Revision 1 - Denotes corrected date

RCRA RECORD CENTER

Cover Sheet

EPA I.D. #	Facility Name	Where to file	Section Code	Date	Signature
TXDC008097529	STAR ENTERPRISE	PERMITS	6H-PT	11-18-91	B. Hurlbut

StarEnterprise

EPA REGION VI
HAZARDOUS WASTE
RCRA PERMITS BRANCH

L T Townsend
Manager
Port Arthur Area



1991 OCT 31 PM 1:00

P O Box 712
Port Arthur TX 77641 0712
409 989 7001

October 24, 1991

Re: Class 3 Permit Modifications
Star Enterprise - Port Arthur Plant
EPA I.D. No. TXD008097529
TWC Permit No. HW-50188-000
ENV 1381, 1310

Mr. Allen Beinke
Executive Director
Texas Water Commission
P. O. Box 13087, Capitol Station
Austin, TX 78711-3087

Attention: Mr. Minor Hibbs, Chief
Permits Section
Hazardous and Solid Waste Division

Dear Mr. Beinke:

Please reference my May 1, 1991 letter to you. As indicated in that letter, we are submitting a Class 3 permit modification for the subject facility. Enclosed are five (5) copies of a Class 3 Permit Modification. In addition, six amended copies of the Part B Section I (General Information) are included. This permit modification includes a modified Part A Permit Application which reflects the necessary changes for this facility.

This permit modification is necessary for the following reasons:

- o The continued management of sludges which meet the description of the newly listed hazardous wastes, Petroleum Refinery Primary Oil/water/solids Separation Sludge, (F037), and Petroleum Refinery Secondary Oil/water/solids Separation Sludge, (F038). The primary or secondary (F037 or F038) sludges will potentially be generated in three Minimum Technology Requirement (MTR) surface impoundments, the lined wastewater conveyance system, or other wastewater treatment facilities.

Mr. Allen Beinke
October 24, 1991
Page 2

- o Closure of two consolidation cells. As indicated in my May 1, 1991 Class 1 permit modification, two areas in the former Reservoir No. 14 were used to consolidate primary sludges (F037) before and after the effective date (May 2, 1991) of this listing. We will discontinue the operation of the Southwest and West Consolidation areas in the former Reservoir No. 14; therefore, we are not requesting a permit to operate these facilities. In this submittal, there is a plan for the closure and post closure activities.
- o Approval to add absorbent material to waste (meeting the definition of treatment) in containers operating under the less than 90 day accumulation exemption without a permit.

Enclosed is a check for \$150.00 for the permitting fee. Should questions arise, please contact O. R. Marshall at (409) 989-7166.

Yours very truly,

STAR ENTERPRISE

Signed: L. T. TOWNSEND
R.J.S.

ORM:JMD

cc: Mr. Robert E. Layton, Jr., EPA, Dallas, TX
Mr. Keith Anderson, TWC, District VI, Beaumont, TX

Enclosures

cc: Steve Markusen, ITEX, Dallas, TX
Sherry Pierce, ITEX, Dallas, TX
Leon Byrd, TWC, Austin, TX